

APPENDIX B6

RESPONSES TO OTHER ORGANIZATIONS AND GROUPS COMMENTS



D.C. TO RICHMOND SOUTHEAST HIGH SPEED RAIL

Appendix B6

RESPONSES TO OTHER ORGANIZATIONS AND GROUPS COMMENTS

This Appendix Section B6 provides detailed responses to Other Organization and Group letters, presented in the below order:

- Randolph Macon College..... B-431
- Sierra Club B-437
- Southern Environmental Law Center (SELC)..... B-440
- Preservation Virginia..... B-446
- Hampton Roads Chamber B-450
- Virginia Chamber of Commerce..... B-452
- Virginia Maritime Association..... B-453
- Virginians for High Speed Rail (VHSR)..... B-454



Office of The President

November 6, 2017

Emily N. Stock, AICP
Manager of Rail Planning
Virginia Department of Rail and Public Transit
DC2RVA Project Office
801 East Main Street, Suite 1000
Richmond, Virginia 23219

RE: Randolph-Macon College comments regarding Draft Environmental Impact Statement

Dear Ms. Stock:

Please accept this as Randolph-Macon College's official comment on the DC2RVA Draft Environmental Impact Statement (DEIS). This is being sent to you during the September 8 to November 7, 2017 DEIS public comment period.

Randolph-Macon College has been pleased to be a constructive part of the Department of Rail and Public Transportation's (DRPT) planning process for the DC2RVA project. We have been significantly engaged since June 2016, when we first learned that the project could have devastating effects on our historic campus. We have been meeting and corresponding frequently with DRPT, the Town of Ashland, Hanover County, area residents and business owners, and, of course, the College's students, faculty, staff, alumni, and others important to our campus community.

In this document, we want to note clearly that Randolph-Macon College is a historic, vibrant, financially strong institution and that it has an undisputed economic and educational impact on Virginia. Additionally, and importantly, the College operates in a very competitive higher education market. A major rail infrastructure project that permanently impacts and disrupts our College will have a significant, long-term negative impact and threaten the College's ability to most effectively compete in the market and continue being an economic and educational force.

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P.O. Box 5005, Ashland, VA 23005-5505 (804) 752-7211 Fax (804) 752-3129 www.rmc.edu

RANDOLPH MACON COLLEGE

1. FRA and DRPT have evaluated the DC2RVA Project through the mechanism of an Environmental Impact Statement (EIS) to satisfy the requirements of the National Environmental Policy Act (NEPA), and provide the public an opportunity to understand and comment on the benefits and impacts of the Project. As part of the NEPA process and documented within Chapter 2 of the Draft EIS and the Alternatives Technical Report (Appendix A of the Draft EIS), FRA conducted a rigorous analysis of Project alternatives and their potential impacts on the natural and/or built environment, including impacts to Randolph Macon College. The Preferred Alternative through the Ashland/Hanover area, Alternative 5A, minimizes adverse impacts on the area's natural and built environments; refer to DRPT-numbered statement #4 for details.

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Important Facts About Randolph-Macon College

We believe it is important for DEIS context to note the College's history, current status, plans for growth, and economic impact.

- **History of Randolph-Macon College**

Founded in 1830, Randolph-Macon College is the nation's oldest Methodist-related institution of higher education. The College was first located in Boydton (Mecklenburg County), Virginia, and was relocated to Ashland in 1868 following the Civil War. The College is home to several historic structures that are in near proximity to the CSX rail line. The campus was added to the National Register of Historic Places and the Virginia Landmarks Register in 1979.

- **Randolph-Macon College Has Important Economic and Educational Impacts**

Today, the College is a thriving corporate and educational entity, employing hundreds of people and producing tens of millions of dollars in local and state economic activity. However, that is not to say that we have it easy. The Virginia and Mid-Atlantic higher education market place is exceedingly competitive, especially for liberal arts institutions.

The following economic impact data is the result of an economic impact analysis done for the College in August 2016:

The College is situated wholly within the Town of Ashland on an approximately 116-acre campus.

The College has some 450 faculty and staff with an approximately \$21.5 million payroll. The College produces more than \$32 million in overall annual direct and indirect local economic activity and some \$1.1 million in local and state taxes in the Ashland/Hanover community. More broadly, the College's direct and indirect annual economic impact statewide supports some 813 jobs and approximately \$75.8 million in economic activity and \$2.3 million in state and local tax revenue.

The College has 1,454 full-time students who, in pursuit of undergraduate degrees, may choose from 34 major fields of study.

The College's 2014-15 graduating class carried with them into the Virginia workforce an economic value of \$5.4 million. Consequently, a four-year academic cycle would produce more than \$21 million in human capital value. Over a decade, it would be some \$54 million.

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RANDOLPH MACON COLLEGE (continued)

2. FRA recognizes the importance of Randolph Macon College to the Town of Ashland, the Commonwealth of Virginia, and the College's many students, employees, and alumnae. The history, current status, and expansion plans of the College are described and considered in the Draft EIS, including in Section 3.11 Community Resources and Section 3.13 Archaeological and Aboveground Cultural and Historic Resources. The Commonwealth's recommendation to FRA specifically requests that the DC2RVA Project be advanced in a manner that avoids and/or minimizes permanent property impacts to the College, as indicated in the Commonwealth Transportation Board's (CTB) Resolution for the Project on December 6, 2017 (which is Appendix H of the Final EIS). Refer to DRPT-numbered statements #3 and #4 for further details.

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The College is a large and financially sound enterprise. We have a budget of more than \$48 million. Our physical assets are valued at more than \$105 million. The College has an enviable S&P bond rating of “A-Stable.”

Our more than 10,000 living alumni are among the most loyal in the nation. In 2016, nearly 40% of alumni contributed to the College. The College ranked #16 nationally among all public and private colleges and universities in alumni loyalty.

In 2015, the College completed a \$125 million capital campaign. More than 12,000 alumni, students, faculty, staff, and friends contributed to this campaign.

• **Randolph-Macon College – Planning for Growth**

The College owns property on both the east and west sides of the north-south CSX rail line. Both sides are active with academic, residential, support/office, and recreational and athletic facilities. There is daily – hourly – pedestrian and vehicle traffic back and forth across the tracks.

The College, at present, has a similarly significant investment for new capital construction and existing facilities improvements planned for our property on the west side of the CSX tracks. This planned construction and improvements have been approved by the Town of Ashland and are part of the Town’s comprehensive plan.

Randolph-Macon College’s Comments on a Preferred Alternative

• **Opposition to a Third Rail At-Grade Through Ashland**

Randolph-Macon College has made clear – and has never waived from – its complete opposition to a third rail at-grade through our historic campus and the Town of Ashland.

In June 2016, the College was shown preliminary plans for a third rail at-grade that included an 850-foot, elevated passenger platform that almost completely divided our historic campus, separating its properties on the east and west sides of the rail line. It also included a commuter parking garage on our campus. These impacts would have inflicted irreparable harm on our campus and endangered our future.

The DRPT-created Community Advisory Committee (CAC) – which included the Town of Ashland, Hanover County, Randolph-Macon College, and CSX – *unanimously rejected* a third rail at-grade through our campus and the Town.

The College remains ardently opposed to a third rail at-grade through our campus and the Town of Ashland, and we commend the CAC for its *unanimous rejection* of that option.

RANDOLPH MACON COLLEGE (continued)

(Response to comment 2 on previous page)

3. The Randolph Macon College Master Plan and the Town of Ashland Comprehensive Plan were both reviewed as a part of the Project’s planning process. The Preferred Alternative for Area 5, Alternative 5A, would not affect any structures on the campus and, pursuant to the CTB resolution of December 6, 2017 (Appendix H of the Final EIS), would not require any property acquisition from the College.
4. DRPT acknowledges the College’s preference to avoid any and all impacts to the College. In accordance with the September 2017 recommendation of the Town of Ashland/Hanover County Community Advisory Committee (CAC) (Appendix G of the Final EIS) and with the December 2017 resolutions of the Commonwealth Transportation Board (Appendix H of the Final EIS), Build Alternative 5A was selected as the Preferred Alternative, as detailed in Section 4.3.5 of the Final EIS.

The Preferred Alternative maintains the existing rail infrastructure through the Town of Ashland and Randolph Macon College campus. Moreover, the Preferred Alternative would not include any roadway or station modifications within downtown Ashland. Any platform improvements at the Ashland Station would be negotiated between the Town of Ashland and Amtrak, separate from and with no proposed changes under the DC2RVA Project. Similarly, there would be no roadway improvements (including no modifications to existing at-grade crossing treatments) between Vaughan Road (Archie Cannon Drive) and Ashcake Road under the DC2RVA Project, including College Avenue/Henry Clay Street crossing, which would remain open with no proposed changes under the DC2RVA Project.

Emily N. Stock, AICP
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The College strongly encourages the Commonwealth Transportation Board to oppose a third-rail at-grade through the College campus and the Town of Ashland.

The College strongly encourages the Federal Railroad Administration to reject a third-rail at-grade through the College campus and the Town of Ashland.

• **Safety Concerns Regarding 3-2-3 Alternative**

In years to come, we would anticipate increased passenger and freight rail as East Coast population and commerce continue to grow. A 3-2-3 option would necessarily mean more – and more frequent – trains through our historic campus, making it more difficult for our students, faculty, and staff to cross the tracks to access the academic, residential, support/office, and recreational and athletic facilities on each side.

A 3-2-3 option also presents significant safety concerns.

The College, therefore, envisions the need for major safety improvements to protect our students, faculty, and staff who daily – hourly – cross the tracks on foot and by vehicle. Safety improvements will become increasingly important as the College grows in enrollment and as additional facilities are constructed on the west side of the tracks.

Such improvements may include pedestrian tunnels and/or bridges, likely at more than one location, along the rail line that adjoins our campus. Also, such safety improvements should be designed in collaboration with the College to most efficiently accommodate pedestrian traffic flow as well as to aesthetically complement our historic campus.

• **Preferred Alternative – Support for Western Bypass, Option AWB-1**

Western Bypass Option AWB-1 is the “least objectionable” alternative identified by Hanover County’s elected Board of Supervisors. It is a two-track bypass between the South Anna River area and the Elmont Road area.

Randolph-Macon College supports Western Bypass Option AWB-1.

At present, this bypass route is envisioned for interoperable freight and certain passenger rail.

This bypass route has identifiable benefits:

- it adds capacity, which is important to CSX and the Commonwealth
- it is the closest Western Bypass option to the CSX mainline
- it is estimated to be the least costly Western Bypass option

RANDOLPH MACON COLLEGE (continued)

(Response to comment 4 on previous page)

5. The DC2RVA Project will increase intercity passenger train frequencies through the Town of Ashland by 9 new daily intercity passenger round-trip trains (18 total trains per day). Existing intercity passenger service is also expected to continue to operate at the current level of 10 daily round trip trains (20 total trains per day) (i.e., the No Build condition). As a result, under the Project (i.e., the Build condition), total intercity passenger train operations, existing and projected, through Ashland are expected to increase to 19 daily round trip trains (38 total), which DRPT expects would continue to operate at the restricted speed of 35 mph set by CSXT. DRPT has also developed a forecast of CSXT freight train growth that estimates operations to nearly double between 2015 and 2045, reaching approximately 40 to 55 daily freight trains in 2045, regardless of implementation of the DC2RVA Project (i.e., the same for both 2045 No Build and Build conditions). These conditions are clarified in Section 4.2 of the Final EIS.

DRPT acknowledges the Town’s safety concern regarding the frequent daily pedestrian and vehicle crossings of the rail corridor in Ashland, and that any pedestrian crossings that occur in locations other than at designated crossings is unsafe and in contradiction to State law (it is a violation of Virginia code §18.2-159) and CSXT policies on trespass. The construction of two new grade separated roadway crossings at Vaughan Road (Archie Cannon Drive) north of town and Ashcake Road south of town in Alternative 5A will provide an alternate means for vehicular passage across the railroad corridor, allowing for a potential reduction in vehicle traffic utilizing the at-grade crossings through town. The Commonwealth of Virginia recognizes the current and future need to improve railroad and roadway safety through Ashland, independent of the DC2RVA Project, and has committed to working with the FRA, Town of Ashland, Randolph Macon College, CSXT, and other stakeholders on improving crossing safety in the Town of Ashland, separate from the DC2RVA Project, as indicated in the CTB Resolution for the Project on December 6, 2017.

(Responses are continued on next page)

Emily N. Stock, AICP
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Page 4

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A 3-2-3 option also presents significant safety concerns.

The College, therefore, envisions the need for major safety improvements to protect our students, faculty, and staff who daily – hourly – cross the tracks on foot and by vehicle. Safety improvements will become increasingly important as the College grows in enrollment and as additional facilities are constructed on the west side of the tracks.

Such improvements may include pedestrian tunnels and/or bridges, likely at more than one location, along the rail line that adjoins our campus. Also, such safety improvements should be designed in collaboration with the College to most efficiently accommodate pedestrian traffic flow as well as to aesthetically complement our historic campus.

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Randolph-Macon College supports Western Bypass Option AWB-1.

At present, this bypass route is envisioned for interoperable freight and certain passenger rail.

This bypass route has identifiable benefits:

- it adds capacity, which is important to CSX and the Commonwealth
- it is the closest Western Bypass option to the CSX mainline
- it is estimated to be the least costly Western Bypass option

RANDOLPH MACON COLLEGE (continued)

6. DRPT recognizes Randolph Macon’s support of the western bypass alternative AWB 1 (a variation of Alternative 5C presented in the Draft EIS), also identified by the Ashland/Hanover CAC as the least objectionable of the western bypass alternatives. However, DRPT eliminated this particular bypass option during the alternatives screening phase due to its impacts to property, wetlands, and other natural resources. Alternative 5A: Maintain Two Tracks through Ashland was selected as the Preferred Alternative for Area 5 (refer to Section 4.3.5 of the Final EIS for details).

The Preferred Alternative 5A provides the railroad and roadway infrastructure required to support the railroad operations proposed in the DC2RVA Project. As presented in Chapter 5 of the Final EIS, Alternative 5A is expected to affect zero historic properties in downtown Ashland, as no additional infrastructure would be constructed within the Town of Ashland or outside of the CSXT railroad right-of-way through Hanover County. The exception to this includes the construction of new highway-rail grade separations where Vaughan Road (Archie Cannon Drive) and Ashcake Road cross the corridor to the north and south. There are no historic properties in the area of potential effects at the Ashcake Road intersection. There is one historic property at the Vaughan Road (Archie Cannon Drive) intersection: the Berkleytown Historic District. The FRA has determined, and the Virginia Department of Historic Resources (DHR) concurred, that the Project will have an adverse effect and a 4(f) use of this resource. Stipulations to mitigate the adverse effect are set forth in the Section 106 Draft Memorandum of Agreement (Appendix K of the Final EIS).

Where all other alternatives considered in the Ashland/Hanover County Area would incur impacts to historic or protected resources; NEPA requires the selection of the “avoidance” alternative, which in this case would be Alternative 5A (Maintain Two Tracks Through Town).

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- o no downtown Ashland or Randolph-Macon College buildings would be affected or removed
- o it alleviates serious safety concerns regarding the constant foot traffic across the tracks at Randolph-Macon College by students, faculty, staff, parents and other visitors (the College hosted over 100,000 people on campus last year alone)
- o per DRPT/CAC reports, it has the least possible permanent impacts on residential dwellings (the DEIS identifies only one possible permanent residential dwelling impact).

Conclusion

The Randolph-Macon College community appreciates the considerable effort put forth by the Department of Rail and Public Transportation to further consider the DC2RVA impacts on our College as well as the Town of Ashland and Hanover County communities. As the State and Federal planning process goes forward, we will remain involved.


The College continues to strongly oppose a third rail at-grade through the College and the Town of Ashland.

The College has significant safety concerns associated with a 3-2-3 alternative.

The College strongly supports as the preferred alternative the Western Bypass, Option AWB-1.

Thank you for the opportunity to submit official comments on the DC2RVA Draft Environmental Impact Statement. Please contact me should you have questions or require additional information.

Sincerely,


Robert R. Lindgren
President

RANDOLPH MACON COLLEGE (continued)

(Response to comment 6 on previous page)

7. Comments noted; refer to DRPT-numbered statements #4 through #6.

18124

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The Sierra Club Falls of the James (SCFOJ), is the local group of the Sierra Club, the largest and most influential grassroots environmental organization in the United States. Following discussion and vote by the SCFOJ Executive Committee, the SCFOJ would like to supply the following comments:

DCtoRVA Rail should be a top priority for the state. Both transit and intercity passenger rail need much higher investment by our state. We need increased revenue sources for transit and rail, to shift \$ from highways to rail, and to allow for HOT lane revenues to go to rail. Transportation is an important part of ameliorating climate change.

SCFOJ wholeheartedly supports keeping and renovating Main Street Station downtown for passenger rail traffic. We are NOT in favor of leaving Main Street Station rail for one mega-station at Boulevard as some propose. Decades ago, SCFOJ had an initiative called 'Restore The Core', to help bring back downtown Richmond from decay and abandonment. We believe that passenger rail is a vital part of that continuing mission. Millions of public dollars have been invested in Main Street Station, the train shed, and the new Pulse bus line as part of a multi-modal transportation vision. It would be absurd and distressing to suddenly change station locations. Main Street Station is the iconic, historic station that our local system needs.

The SCFOJ also supports the upgrading of tracks between Staples Mill and Petersburg. While this section involves costly upgrades, we must not shy away from making it a priority. The two station approach -- Main Street, plus keeping Staples Mill -- is appropriate. Staples Mill can serve the suburban west end market and park and ride market through access via 95, 64, and Powhite, while Main Street can serve the revitalizing city and downtown, connecting our state capital directly to Capital Hill in DC, and connect directly to the Pulse Bus Rapid transit.

All construction must meet high standards for sediment and erosion control and long-term stormwater management. We promote the "Rails with Trails" goals of the bike advocates -- because the project offers the opportunity to create a major N-S bikeway, though be aware that there are wetlands where it could increase area of fill. The SCFOJ is also hopeful that government can take advantage of opportunities to integrate solar into these projects.

Sincerely,

Scott Burger, on behalf of the Executive Committee of the Sierra Club Falls of the James.
(I supplied my own personal comments earlier, separately, but this is for the SCFOJ)

SIERRA CLUB

1. Transportation priorities for the Commonwealth of Virginia are set by the Commonwealth Transportation Board (CTB) and described in Virginia's Statewide Transportation Plan (Vtrans2040) and the 2017 Virginia State Rail Plan. The DC2RVA Project is listed as a priority project for the Commonwealth.
2. Section 4.2 of the Final EIS provides additional clarification to existing and proposed service at Main Street Station. Main Street Station currently serves 2 round trips (4 total daily) intercity passenger trains. Under Build conditions of the DC2RVA Project, the S-Line will be rebuilt, enabling all existing and proposed new intercity passenger trains stopping at Richmond to serve both Staples Mill Road and Main Street Stations. As a result, Main Street Station will see a total of 18 round trips (36 total daily) intercity passenger trains, which is an increase of 16 round trips (32 total daily) intercity passenger trains above the current service level at Main Street Station. Of those, the DC2RVA Project will:

- Add 9 new daily intercity passenger round trips (18 new total trains per day)
- Also reroute 7 existing daily intercity passenger round trips (14 existing total trips per day)

Thus, the Preferred Alternative for Area 6 - Richmond will increase access to passenger rail services to residents and travelers within the City's Central Business District. The proposed routing of all of the existing and proposed passenger trains (excluding the Auto Train) to serve both Staples Mill Road Station and Main Street Station via the S-Line maximizes passenger rail service to Richmond's downtown. The proposed improvements to accommodate such services at Main Street Station are consistent with the City of Richmond's plans for the station and surrounding area.

(Responses are continued on next page)

18124

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The Sierra Club Falls of the James (SCFOJ), is the local group of the Sierra Club, the largest and most influential grassroots environmental organization in the United States. Following discussion and vote by the SCFOJ Executive Committee, the SCFOJ would like to supply the following comments:

DCtoRVA Rail should be a top priority for the state. Both transit and intercity passenger rail need much higher investment by our state. We need increased revenue sources for transit and rail, to shift \$ from highways to rail, and to allow for HOT lane revenues to go to rail. Transportation is an important part of ameliorating climate change.

SCFOJ wholeheartedly supports keeping and renovating Main Street Station downtown for passenger rail traffic. We are NOT in favor of leaving Main Street Station rail for one mega-station at Boulevard as some propose. Decades ago, SCFOJ had an initiative called 'Restore The Core', to help bring back downtown Richmond from decay and abandonment. We believe that passenger rail is a vital part of that continuing mission. Millions of public dollars have been invested in Main Street Station, the train shed, and the new Pulse bus line as part of a multi-modal transportation vision. It would be absurd and distressing to suddenly change station locations. Main Street Station is the iconic, historic station that our local system needs.

The SCFOJ also supports the upgrading of tracks between Staples Mill and Petersburg. While this section involves costly upgrades, we must not shy away from making it a priority. The two station approach -- Main Street, plus keeping Staples Mill -- is appropriate. Staples Mill can serve the suburban west end market and park and ride market through access via 95, 64, and Powhite, while Main Street can serve the revitalizing city and downtown, connecting our state capital directly to Capital Hill in DC, and connect directly to the Pulse Bus Rapid transit.

All construction must meet high standards for sediment and erosion control and long-term stormwater management. We promote the "Rails with Trails" goals of the bike advocates -- because the project offers the opportunity to create a major N-S bikeway, though be aware that there are wetlands where it could increase area of fill. The SCFOJ is also hopeful that government can take advantage of opportunities to integrate solar into these projects.

Sincerely,

Scott Burger, on behalf of the Executive Committee of the Sierra Club Falls of the James.
(I supplied my own personal comments earlier, separately, but this is for the SCFOJ)

SIERRA CLUB (continued)

3. The Federal Railroad Administration (FRA) and the Department of Rail and Public Transportation (DRPT) recognize the need to improve the full railroad corridor to achieve the full goals and benefits of the larger Southeast High Speed Rail (SEHSR) Program and the Virginia State Rail Plan. The DC2RVA Project proposes track improvements between Arlington and Centralia, VA, and the Richmond to Raleigh (R2R) Tier II EIS/ROD identifies track and other improvements between Centralia, VA and Raleigh, NC, through Petersburg, VA. Section 7.7 of the Final EIS, which has been added since the Draft EIS, addresses the necessary coordination with previous and ongoing studies and projects that are within and/or adjacent to the DC2RVA corridor, that are critical to Project success.
4. DRPT acknowledges the Sierra Club's preference for a two-station approach, which aligns with the Preferred Alternative for Richmond: Alternative 6F: Full Service (Staples Mill Road Station and Main Street Station). Under the Preferred Alternative, all of the existing and proposed passenger trains (excluding the Auto Train) serve both Staples Mill Road Station and Main Street Station. Additionally, the provision of a two-station alternative in Richmond allows for a distribution of ridership, parking, and automobile traffic among the stations.
5. Specific sediment and erosion control measures will be developed during final design as funds become available for final design, permitting, and construction. DRPT will implement comprehensive Best Management Practices (BMPs) for sediment and erosion controls on both a temporary basis during construction and on a long-term basis for the life of the Project.

(Responses are continued on next page)

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All construction must meet high standards for sediment and erosion control and long-term stormwater management. We promote the "Rails with Trails" goals of the bike advocates -- because the project offers the opportunity to create a major N-S bikeway, though be aware that there are wetlands where it could increase area of fill. The SCFOJ is also hopeful that government can take advantage of opportunities to integrate solar into these projects.

Sincerely,

Scott Burger, on behalf of the Executive Committee of the Sierra Club Falls of the James.
(I supplied my own personal comments earlier, separately, but this is for the SCFOJ)

SIERRA CLUB (continued)

6. Comment noted. The decision to establish a new greenway is a separate and distinct action from establishing high speed passenger rail service under the National Environmental Policy Act (NEPA). During Project scoping, FRA and DRPT received public comments in support of establishing a bicycle/walking path or greenway alongside the DC2RVA corridor. FRA and DRPT considered the addition of a greenway, but determined such a bicycle/walking path was not required to meet the Project's Purpose and Need, as providing a greenway does not support or enhance passenger rail service, nor is it a transportation choice for corridor-level travel. CSXT does not allow recreational use of its right-of-way for safety reasons, and therefore any greenway or path would require additional right-of-way to be acquired along the corridor. This Project does not preclude further consideration or development of such a greenway / path under a separate project in the future.



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November 7, 2017

Ms. Emily Stock
Manager of Rail Planning
Virginia Department of Rail and Public Transportation
info@DC2RVArail.com

BY E-MAIL

Re: DC to Richmond Southeast High Speed Rail Study Tier II Draft Environmental Impact Statement

Dear Ms. Stock:

The Southern Environmental Law Center (SELC) would like to provide the following comments on the Tier II Draft Environmental Impact Statement (DEIS) for the Washington, DC to Richmond High Speed Rail (DC2RVA) project. These comments build upon our earlier written and public comments on this project. SELC works throughout Virginia to promote transportation and land use decisions that strengthen our communities, protect our natural resources, and improve our quality of life. This includes a focus on developing a more sustainable transportation system and providing Virginians with a broader range of transportation choices.

We strongly support enhancing passenger and freight rail in the Commonwealth, and we have long supported efforts to provide fast, frequent, and reliable passenger rail service in the critical Washington, DC to Richmond corridor. The DC2RVA corridor is central to the movement of people and freight throughout Virginia, and it is both a crucial segment of the Southeast High Speed Rail Corridor and a key connector to the Northeast Corridor. The DC2RVA high speed rail project offers multiple benefits, including promoting more compact development patterns, greater energy efficiency, reduced traffic congestion, cleaner air, and providing a backbone for a larger network of efficient transportation options—including increased local light rail and transit. As Virginia Secretary of Transportation Aubrey Layne notes, as quoted on page 4 of the DEIS, the cost and/or impacts of further widening of I-95 and I-395 are prohibitive, and we need to provide travel choices that can take some of the trucks and cars off of these highways. Improving the DC2RVA corridor needs to be a top transportation priority for the Commonwealth.

SELC again suggests that the final set of recommendations list specific near- and intermediate-term projects, and the anticipated benefits and costs of these projects, to reduce resistance to the cost of the total package of recommendations. It is likely to be many years before there is funding to advance a large portion of the DEIS recommendations, and it would be helpful to indicate priority projects that can proceed as funding becomes available and to focus on increasing on-time performance more than increasing speed, continuing the incremental approach that has served Virginia well.

Charlottesville • Chapel Hill • Atlanta • Asheville • Birmingham • Charleston • Nashville • Richmond • Washington, DC

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SOUTHERN ENVIRONMENTAL LAW CENTER (SELC)

- Chapter 7 of the Final EIS, which has been added since the Draft EIS, provides descriptions of future steps of the Project, including funding, prioritization of adding capacity, final design, permitting, and construction. Complete build-out of the corridor and full implementation of the DC2RVA improvements (and realization of all Project benefits) is dependent on future state and federal funding. DRPT anticipates the DC2RVA Project would be implemented incrementally, as funding becomes available. The funding for the Project is anticipated to come from multiple sources, including federal, state, and local funds, plus passenger fare revenue recovery and private sector sources. Subsequent to the Final EIS, DRPT is developing a Corridor Service Development Plan that addresses likely phasing of improvements and Project benefits, including additional train service and improved reliability. DRPT has identified the following priorities for adding track capacity along the 123-mile DC2RVA corridor: Areas 1, 2, and 3, Arlington through Fredericksburg; Area 6 Richmond (including improvements to Staples Mill Road Station); Area 4 Central Virginia; and Area 5 Ashland. This does not preclude upgrading stations, or constructing highway-rail grade separations or at-grade crossing improvements, independently of the DC2RVA Project, should federal, state, local, or other funding become available.

As noted in our previous comments on DC2RVA, we urge continuation of the approach called for in the Tier I Record of Decision and efforts thus far to upgrade service using existing infrastructure and right of way to reduce costs and to minimize harm to natural resources and communities. We support the recommended improvements in the Arlington, Northern Virginia, and Central Virginia segments of the corridor overall, although the potential adverse impacts identified need to be minimized and mitigated. In addition, we were pleased to see that DRPT's recommendations in the Tier II DEIS do not include the potential freight bypass of Fredericksburg, which would have significant adverse impacts, although we urge a concerted effort to minimize and mitigate adverse impacts to historic resources if work proceeds on the recommended expansion through the City.

SELC remains concerned about the potential western bypass of Ashland, which remains on the table. The significant potential impacts of the bypass on wildlife habitat, wetlands, agricultural lands, endangered and threatened species, and historic and cultural resources suggest that the "trench" alternative through Ashland should be studied and developed further, since it appears to have the fewest long-term adverse impacts. The best overall short- and intermediate-term strategy for the Ashland area may be to achieve higher speeds by focusing on improvements elsewhere in the corridor, by having fewer—if any—trains stop in Ashland, and by increasing train speeds through town, while recognizing that future capacity may be needed to prevent the area from becoming a bottleneck that could create service issues along the rest of the corridor.

Regarding the Richmond station location and system issues, SELC continues to believe that priority should be given to locations that serve a higher density of citizens, transit oriented development, and central business districts. Although the proposed Boulevard location offers potential opportunities to spur redevelopment, it appears to have a number of serious operational challenges, potential equity issues regarding accessibility of service, significant potential cultural resource impacts, and potential adverse impacts upon passenger service on the Peninsula to Williamsburg and Newport News. Accordingly, we support the recommendation to retain the two stations currently serving the region. Routing as much traffic as possible to Main Street Station appears to be the best overall option for improving Peninsula service as well as service in the I-95 corridor, for addressing concerns about equitable access to service, and for providing downtown-to-downtown service. Main Street Station should be paired with Staples Mill, and substantial improvements to the current Staples Mill Station should be a priority—particularly since it is Virginia's busiest station.

We note that there are some errors in the DEIS regarding the characterization of preferred alternative 6F in the Richmond region in the Executive Summary and in Chapter 2 that suggest that long distance passenger trains would bypass Main Street Station, contrary to what Alternative 6F entails as described elsewhere in the DEIS. We understand that DRPT is aware of these errors and has committed to correcting them.

We also are concerned about the recommendation to force more of the national trains over to the S-line in Richmond, ceding much if not all of the passenger rail access to the A-line around downtown. Shifting to the S-line would cost Virginia a significant amount of

SOUTHERN ENVIRONMENTAL LAW CENTER (SELC)

(continued)

2. Comment noted. Additional measures to minimize and mitigate potential adverse effects will be developed during final design, after incremental improvements are scheduled and funding is secured.
3. In accordance with the September 2017 recommendation of the Town of Ashland/Hanover County Community Advisory Committee (CAC) and with the December 2017 resolutions of the Commonwealth Transportation Board (CTB), Alternative 5A was selected as the Commonwealth's Preferred Alternative, which maintains the existing rail infrastructure through the Town of Ashland and the Randolph Macon College campus. Preferred Alternative 5A provides the railroad and roadway infrastructure required to support the railroad operations proposed in the DC2RVA Project, and no other alternatives/improvements in the Ashland area are recommended as part of the Preferred Alternative.

A station stop would remain in Ashland under the Preferred Alternative. However, platform improvements at the Ashland Station would be negotiated between the Town of Ashland and Amtrak, separate from and with no proposed changes under the DC2RVA Project. Similarly, there would be no roadway improvements (including no modifications to existing at-grade crossing treatments) between Vaughan Road and Ashcake Road under the DC2RVA Project, including College Avenue/Henry Clay Street, which would remain open with no proposed changes under the DC2RVA Project.

FRA and DRPT anticipate that train speeds within the Town of Ashland, which are set by CSXT under their operating rules, would remain restricted for safety (currently, 35 mph) due to the number of at-grade vehicle and pedestrian crossings within the Town. The frequency of intercity passenger train service to the Ashland Station would be further determined during development of the Corridor Service Development Plan following the Final EIS and Record of Decision (ROD); refer to Section 7.3 of the Final EIS for details.

(Responses are continued on next page)

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We also are concerned about the recommendation to force more of the national trains over to the S-line in Richmond, ceding much if not all of the passenger rail access to the A-line around downtown. Shifting to the S-line would cost Virginia a significant amount of

SOUTHERN ENVIRONMENTAL LAW CENTER (SELC)

(continued)

4. DRPT acknowledges SELC's preference for a two-station approach, which aligns with the Preferred Alternative for Richmond: Build Alternative 6F: Full Service (Staples Mill Road Station and Main Street Station). The Preferred Alternative routes all of the existing and proposed passenger trains (excluding the Auto Train) to serve both Staples Mill Road Station and Main Street Station, thereby maximizing passenger rail service to Richmond's downtown and existing Staples Mill area.
5. DRPT confirms that the mis-identified train movements are corrected in the Final EIS. All north-south intercity passenger service on the corridor, with the exception of Amtrak's Auto Train, would be routed through Main Street Station under the Preferred Alternative.

(Responses are continued on next page)

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SOUTHERN ENVIRONMENTAL LAW CENTER (SELC) (continued)

6. As part of the Preferred Alternative in Richmond (Alternative 6F, as described in DRPT-numbered statement #4 above), all north-south intercity passenger service on the corridor, with the exception of Amtrak's Auto Train, would be routed through Main Street Station. The Auto Train would bypass Main Street Station on the A-Line, as it does not stop in Richmond and does not fit through the historic Triple Crossing rail structure immediately south of Main Street Station. Operating some intercity passenger trains on the A-Line (as suggested within the comment) would prevent them from stopping at Main Street Station, and would be inconsistent with the Preferred Alternative.

DRPT performed detailed operations analysis of the railroad network through the Richmond section of the DC2RVA corridor, which supported the advancement of the alternatives shifting passenger service to the S-Line through Richmond. Chapter 2.6 and Appendix I (Operations Modeling) of the Draft EIS provide additional information on the operations modeling process in regard to routing operations in and around Richmond. The forecasted growth in freight traffic through the corridor in the No Build Alternative and all considered Build Alternatives demonstrated increased demand for freight capacity on the A-Line west of downtown Richmond; however, there is limited ability to increase capacity on the A-Line due to its constrained alignment in the median of I-195 and across the James River. Through physical survey and continued operations analysis, DRPT determined that the S-Line can accommodate the construction of additional capacity to support the reroute of existing and expansion of intercity passenger rail service proposed in the DC2RVA Project. DRPT believes that the A-Line does offer much needed redundancy in the Richmond area's passenger and freight rail network should unforeseen occurrences inhibit the movement of trains via the S-line. The infrastructure improvements proposed by the DC2RVA Project do not preclude use of the A-Line by passenger trains in the event of unforeseen occurrences that would prevent the use of the S-Line for passenger service, or if desired by Amtrak under its statutory authority. Refined operations analysis as part of the Final EIS looked at the ability of the corridor as a whole to meet the Project's Purpose and Need; refer to Final EIS Section 3.2 and its Appendix F.

funds for train slots and infrastructure maintenance it does not have to pay for the A-line, and we should be very careful not to give up any capacity or access that may be needed later. As SELC, Virginians for High Speed Rail, and others have commented previously, it makes sense to maintain access to the A-line and incrementally increase routing via the S-line.

Further, we are concerned that the potential changes at Main Street Station and the resulting development that project could spur could harm the significant archaeological, historical, and cultural resources in the area. The DEIS does note the presence of archeological sites below parking lots near Main Street Station (page 4-130), but it fails to mention the African Burial Ground, Devil's Half Acre (Lumpkin's Slave Jail Site), and other buried remains throughout Shockoe Bottom associated with enslavement history. We understand that DRPT is aware of this issue and has concluded that the proposed improvements to Main Street Station do not directly encroach on the resources sought to be protected by the proposed Shockoe Bottom Memorial Park. However, these resources should be acknowledged in the final EIS and further study of the archaeological, historical, and cultural resources in Shockoe Bottom should be conducted, the Area of Potential Effects (APE) should be expanded to encompass these resources, and the DEIS should be amended to consider the direct, indirect and cumulative impacts the project could have on these resources as well as steps to avoid, minimize, or mitigate potential harm from the project and reasonably foreseeable development.

Finally, SELC continues to be concerned with the practicality of various potential improvements recommended in the DEIS given the relationship with the host railroad, CSX. As we have stated previously, CSX is a key potential partner and/or obstacle to enhanced rail services—both freight and passenger—in the DC2RVA corridor, particularly in the Richmond region. Current Richmond Terminal operations are inefficient and slow, and are causing serious delays to passenger trains, hurting ridership. We have heard anecdotal evidence that CSX is also harming passenger service by having freight trains use the bypass that is supposed to be used for passenger trains only. Significant additional expenditures of public funds in the DC2RVA corridor cannot be justified if CSX is not even living up to existing promises. We continue to believe that a “win-win” solution is possible, and that there are many arrangements within the railroad industry that can be adopted and used that would mutually benefit CSX and the public while ensuring reimbursement and penalties if promises are not kept.

Thank you for your consideration of these comments. We look forward to continuing to work with DRPT to improve this critical corridor.

Sincerely,



Trip Pollard
Director, Land and Community Program

SOUTHERN ENVIRONMENTAL LAW CENTER (SELC) (continued)

(Response to comment 6 on previous page)

7. The FRA and DRPT fully understand the sensitivity and significance of the Shockoe Bottom area, and in particular the area slated for the Memorial Park. DRPT reviewed prior studies that recorded and evaluated archaeological and architectural properties in this area, which have been ongoing since 2006. Resources in Shockoe Bottom, including the proposed Memorial Park area, are discussed in Chapters 3, 5, and 6 of the Final EIS and within several reports in its Appendix D (cultural resource technical reports). Throughout the studies and agency/public consultation, the historic places in this area have been taken into consideration, including Lumpkins Jail/Devil's Half Acre and the Burial Ground, among others. The Preferred Alternative does not impact the known boundaries of these sites. At the request of several consulting parties, Lumpkins Jail site was added to the list of historic properties. The DHR determined that the Project will have no adverse effect on the site as no impacts will occur as part of the Project. A commitment to create a historic context on the Shockoe Bottom area and the slave trade is included in the Section 106 Draft Memorandum of Agreement (Appendix K of the Final EIS).

Alternative 6F (Full Service Staples Mill Road/Main Street Station) was selected as the Preferred Alternative in Area 6 through Richmond. Through review and investigation of historic records, consultation with consulting parties and other groups with a vested knowledge of this area, and in comments received from the public and SELC, DRPT has reduced the facilities proposed for construction at Main Street Station to the minimum infrastructure necessary to deliver the service proposed in the DC2RVA Project, including: a reduction in the design length of the platforms on the east and west sides of the station to remain south of East Broad Street and to the minimum width feasible to support the forecasted level of ridership and services provided at the station, and the removal of the proposed parking deck. The provision of a two-station alternative in Richmond allows for a distribution of ridership, parking, and automobile traffic among the two stations. Therefore, the Preferred Alternative minimizes the infrastructure required and potential impacts associated with Main Street Station and nearby historic properties.

(Responses are continued on next page)

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Finally, SELC continues to be concerned with the practicality of various potential improvements recommended in the DEIS given the relationship with the host railroad, CSX. As we have stated previously, CSX is a key potential partner and/or obstacle to enhanced rail services—both freight and passenger—in the DC2RVA corridor, particularly in the Richmond region. Current Richmond Terminal operations are inefficient and slow, and are causing serious delays to passenger trains, hurting ridership. We have heard anecdotal evidence that CSX is also harming passenger service by having freight trains use the bypass that is supposed to be used for passenger trains only. Significant additional expenditures of public funds in the DC2RVA corridor cannot be justified if CSX is not even living up to existing promises. We continue to believe that a “win-win” solution is possible, and that there are many arrangements within the railroad industry that can be adopted and used that would mutually benefit CSX and the public while ensuring reimbursement and penalties if promises are not kept.

Thank you for your consideration of these comments. We look forward to continuing to work with DRPT to improve this critical corridor.

Sincerely,



Trip Pollard
Director, Land and Community Program

SOUTHERN ENVIRONMENTAL LAW CENTER (SELC) (continued)

8. FRA and DRPT are committed to continue working with CSXT to improve intercity passenger rail service in the DC2RVA corridor, and have a long and successful history of cooperating with CSXT to improve passenger, commuter, and freight rail service in the Commonwealth. FRA and DRPT also recognize that CSXT owns and operates the DC2RVA rail corridor, and has a responsibility to its shareholders and customers to provide efficient freight rail service. Timely passenger train movements through the CSXT Richmond Terminal operations at Acca Yard are an existing issue, and a separate project is currently underway to allow through movements of trains onto the A-Line while reducing interference from yard operations. The Preferred Alternative for the Richmond area, Alternative 6F, also includes provisions for passenger trains to bypass Acca Yard to the east while moving between Staples Mill Road Station and Main Street Station, thereby reducing future conflicts.

21212



PRESERVATION VIRGINIA

7 November 2017

Ms. Emily Stock
 Manager of Rail Planning
 DRPT
 DC2RVA Project Office
 801 East Main Street, Suite 1000
 Richmond, VA 23219
 By email info@DC2RVArail.com

Dear Ms. Stock,

On behalf of Preservation Virginia's Trustees, staff and statewide membership, I am writing to register our comments as the Federal Railroad Administration evaluates the potential environmental impacts of the proposed high-speed railroad facility at Main Street Station.

Shockoe Bottom was the center of the slave trade in Richmond. Second only to New Orleans, the area was populated by jails that facilitated the sales' process of enslaved people and the businesses and industries that supported that market place. The African Burial Ground is a sacred place where enslaved and freed African Americans found their final rest. Today, the area has been literally paved over--capturing an archeological record of the streets, buildings and associated structures that facilitated these commercial activities.

With its important archaeological, cultural and historic resources, Shockoe Bottom requires careful study and evaluation before any decisions about the high-speed rail facility are made. While Devil's Half Acre (Lumpkin's Jail) has been excavated and studied, it is the only area that has been evaluated. That excavation and the archival work that has been undertaken prove the likelihood that the archeological evidence of other buildings and street patterns exists under the asphalt and awaits study.

Before any plans are finalized, Preservation Virginia urges the Federal Railroad Administration to:

- Commission a comprehensive analysis of the archaeological, historical and cultural resources in Shockoe Bottom.
- Evaluate Shockoe Bottom for listing on the National Register of Historic Places.
- Expand the "Area of Potential Effects" to include the archaeological, historical, and cultural resources associated with Shockoe Bottom.
- Consider the full range of potential impacts -- "direct, indirect and cumulative" -- to these surviving resources and study ways to "avoid, minimize, or mitigate" potential harm from the railroad facility, and any reasonably foreseeable real estate development.

Preservation Virginia has been a voice for historic places since 1889. As the Commonwealth's nonprofit statewide historic preservation organization, we seek ways to save historic places while accommodating

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1. The FRA and DRPT fully understand the sensitivity and significance of the Shockoe Bottom area, and in particular the area slated for the Memorial Park. DRPT reviewed prior studies that recorded and evaluated archaeological and architectural properties in this area, which have been ongoing since 2006. Resources in Shockoe Bottom including the proposed Memorial Park area are discussed in Chapters 3, 5, and 6 of the Final EIS and within several reports in Appendix D (cultural resource technical reports). Throughout the studies and agency and public consultation, the historic places located in this area have been taken into consideration during Project planning. This includes Lumpkins Jail/Devil's Half Acre and the Burial Ground, among others. The Project, as currently designed, does not impact the known boundaries of these sites. At the request of several consulting parties, the Lumpkins Jail site was added to the list of historic properties. The DHR concurred that the Project will have no adverse effect on the site as no impacts will occur as part of the Project. However, a commitment to create a historic context on the Shockoe Bottom area and the slave trade is included in the Section 106 Draft Memorandum of Agreement (Appendix K of the Final EIS). Alternative 6F (Full Service Staples Mill Road/Main Street Station) was selected as the Preferred Alternative in Area 6 through Richmond. Through review and investigation of historic records, consultation with Project consulting parties and individuals with a vested knowledge in this area, and in comments received from the public and Preservation Virginia, DRPT has reduced the facilities proposed for construction at Main Street Station to the minimum infrastructure necessary to deliver the service proposed in the DC2RVA Project. This includes a reduction in the length of the platforms on the east and west sides of the station to remain south of East Broad Street and to the minimum width feasible to support the forecasted level of ridership and services provided at the station, and the removal of the proposed parking deck. The provision of a two-station alternative in Richmond allows for a distribution of ridership, parking, and automobile traffic among the two stations. Therefore, this minimizes the infrastructure required and potential impacts associated with Main Street Station.

(Responses are continued on next page)

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With its important archaeological, cultural and historic resources, Shockoe Bottom requires careful study and evaluation before any decisions about the high-speed rail facility are made. While Devil's Half Acre (Lumpkin's Jail) has been excavated and studied, it is the only area that has been evaluated. That excavation and the archival work that has been undertaken prove the likelihood that the archeological evidence of other buildings and street patterns exists under the asphalt and awaits study.

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PRESERVATION VIRGINIA (continued)

2. The DC2RVA limits of disturbance have been the subject of a Phase IA archaeological reconnaissance and predictive model and a Phase IB survey, which included noting previously recorded sites and recording new resources in any areas where ground-disturbing activities may occur. DRPT is fully committed to conducting full archaeological studies on any area where disturbance cannot be avoided. Refer to DRPT-numbered statement #4 for additional response regarding the Area of Potential Effects.
3. The Shockoe Valley and Tobacco Row Historic District is listed in the NRHP. Refer to Chapters 3, 5, and 6 of the Final EIS for additional data on this resource. As FRA has determined, and DHR has concurred, that the Project will have an adverse effect on the district, the resource is also discussed in the Section 106 Draft Memorandum of Agreement (Appendix K of the Final EIS) to outline mitigations to resolve adverse effects. Regarding a possible archaeological district associated with enslaved individuals as a future study, should the City elect to pursue such a district, Chapter 3 presents a narrative on this area and includes concepts for future study including a potential district.
4. DRPT and FRA focused on minimizing the infrastructure required and the limits of proposed disturbance in this area in order to avoid subsurface impacts to the extent practicable. DRPT is fully committed to conducting full archaeological studies on any significant site where disturbance cannot be avoided per Section 106 of the National Historic Preservation Act of 1966. DRPT has conversed extensively with the DHR regarding archaeological study outside of the limits of disturbance, and the DHR has concluded that preservation in place is the priority, as archaeology can be a destructive science. As such, no excavations have occurred outside of the Project limits of disturbance. For any site located within the limits of disturbance where avoidance is not possible, FRA has determined that the Project will have an adverse effect on these resources. The Section 106 Draft Memorandum of Agreement (Appendix K of the Final EIS) outlines the steps that will be taken to mitigate the adverse effects on these resources.

(Responses are continued on next page)

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PRESERVATION VIRGINIA (continued)

5. Discussion of direct, indirect, and cumulative impacts to surviving resources at Main Street Station and Shockoe Bottom were addressed in the Draft EIS. However, FRA and DRPT have included additional information in the Chapter 3 of the Final EIS which helps the reader understand the historical context and the studies performed to date in the Shockoe Bottom area.

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PRESERVATION VIRGINIA (continued)

6. FRA and DRPT are committed to avoiding and minimizing impacts to historic properties—both above and below ground—throughout the DC2RVA study process.

appropriate revitalization and economic development vitality. In 2014, Preservation Virginia named Shockoe Bottom to Virginia's Most Endangered Historic Sites to spotlight the threats and forward possible solutions. We have worked with the National Trust for Historic Preservation, the Sacred Grounds Historical Reclamation Project, and the Center for Design Engagement to forward a conceptual plan for a 9 acre memorial park that would share this history and be a place for interpretation, contemplation, and reconciliation.

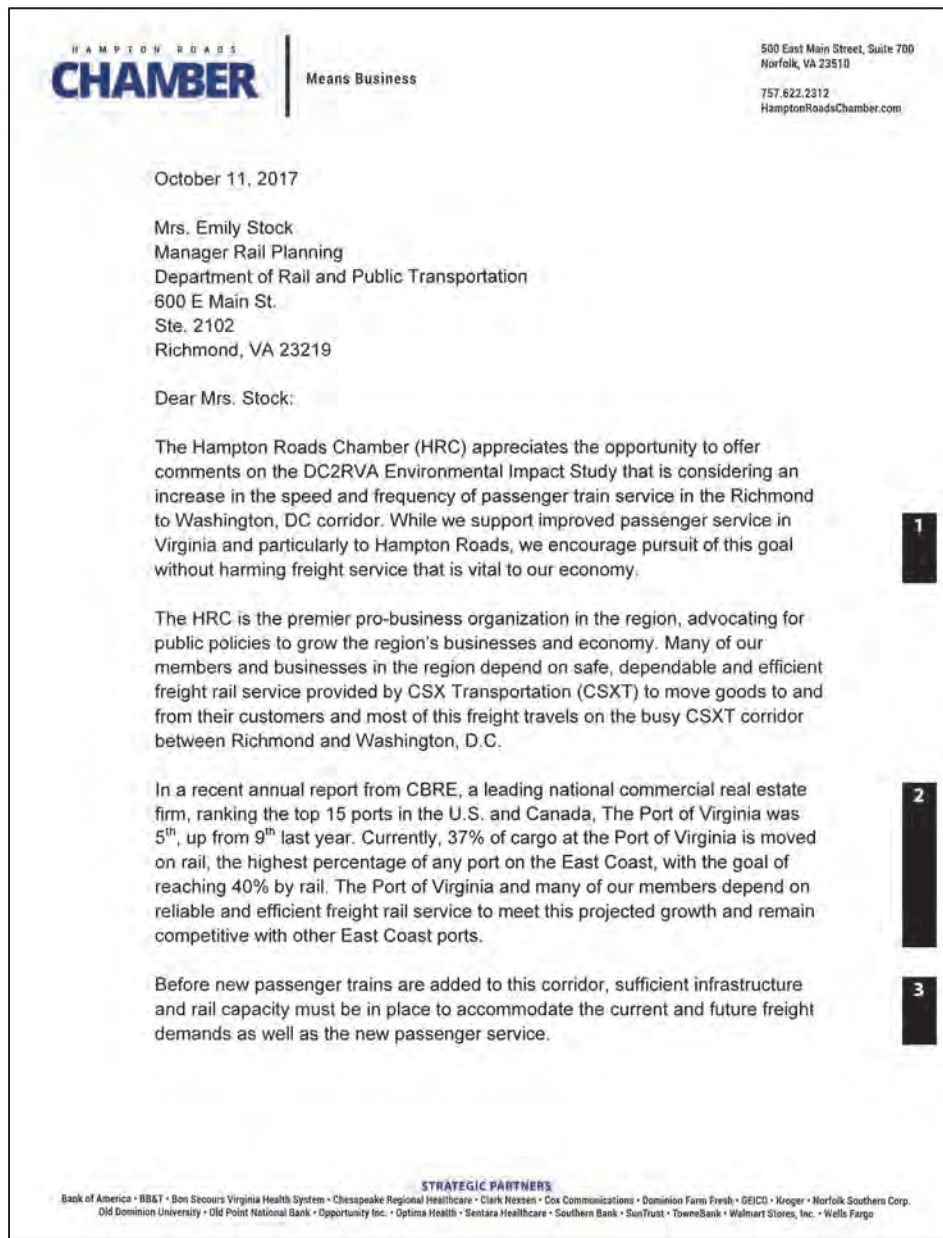
We know from our internationally acclaimed archaeological research effort at 1607 James Fort the extraordinary power that is gained by standing where history happened. Through careful and thoughtful planning, Shockoe Bottom similarly can be a place that engages people in an examination of the difficult and painful history of American slavery on the very ground on which enslaved people were traded, imprisoned, and died.

Preservation Virginia encourages the Federal Railroad Administration to fully explore ways to "avoid, minimize, or mitigate" any future harm to Shockoe in its planning effort. Thank you for considering our views.

Sincerely,


Elizabeth S. Kostelny
Chief Executive Officer

6



HAMPTON ROADS CHAMBER

1. The DC2RVA Project proposes to accommodate efficient movement of rail freight traffic in the DC2RVA Corridor. The Project's stated Purpose is to increase railroad capacity between Washington, D.C. and Richmond, VA, not only to deliver improved passenger rail service, but also to support the planned expansion of Virginia Railway Express (VRE) commuter rail service and accommodate the forecasted growth of freight rail service by developing an efficient and reliable multimodal rail corridor. Improvements to freight rail operations in the corridor would also encourage economic development by increasing freight traffic through Virginia's ports, and present an opportunity for greater diversion of freight transport from congested highways to rail.
2. The Department of Rail and Public Transportation (DRPT) recognizes that the Port of Virginia is a major source of economic growth for the Commonwealth. Over the next 20 years, containerized cargo volume coming into the United States is expected to triple, far surpassing the capacity of existing United States ports. Much of this containerized cargo would be transported by rail, including freight trains along the DC2RVA corridor.

(Response to comment 3 on next page)

While we support improved passenger rail service in Virginia and Hampton Roads, we encourage you to achieve this goal without limiting the valuable freight service CSXT provides to the Port of Virginia and businesses in our region.

Sincerely,



Bryan K. Stephens
President and CEO
Hampton Roads Chamber

3

2

HAMPTON ROADS CHAMBER (continued)

3. DRPT conducted preliminary operations simulation modeling to estimate rail performance in the corridor, including impacts to freight rail. The preliminary operations simulation modeling has focused on verifying that the DC2RVA Project's proposed rail capacity improvements would meet the DC2RVA Project's Purpose and Need, and specifically would meet intercity passenger train and freight service performance goals established in the Passenger Rail Investment and Improvement Act (PRIIA).

The operations simulation modeling incorporated increases in freight train frequencies projected through the year 2045. To determine projected freight train growth for the operations simulations, DRPT used CSXT input derived from the U.S. Department of Transportation's Freight Analysis Framework (FAF) to forecast how rail freight traffic in the corridor would increase and change through the year 2045. While CSXT's actual freight growth may be greater or less than the projected growth rates based on market demands, both DRPT and the Federal Railroad Administration (FRA) concluded that the FAF provided a reasonable basis for estimating future freight movement.

Refer to Section 3.2 of the Final EIS and its Appendix F for details of the operations modeling process.



October 24, 2017

Mrs. Emily Stock
 Manager Rail Planning
 Department of Rail and Public Transportation
 600 E Main Street, Suite 2102
 Richmond, VA 23219

Dear Mrs. Stock:

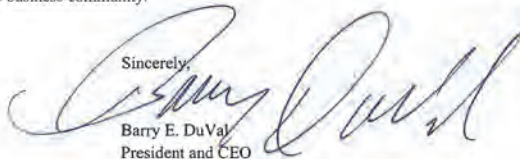
On behalf of the Virginia Chamber of Commerce, I am writing to share comments on the DC2RVA Environmental Impact Study that is considering additional passenger rail service in the Richmond to Washington, DC corridor. While we support improved passenger service, we encourage you to attain this goal without negatively impacting the freight rail network in Virginia.

The CSX Transportation (CSXT) rail corridor between Richmond and Washington D.C. is one of the busiest in the nation. In addition to hosting a significant number of commuter and intercity passenger trains, this is also an important North-South artery of CSXT's network, providing double-stack container service between the Port of Virginia and the Midwest and moving goods for many other small and large businesses across Virginia.

Freight rail is an essential part of Virginia's economy. CSXT provides safe, efficient and reliable service to its customers, helping these businesses grow and support jobs in Virginia, while keeping more trucks off the interstates. Recognizing the benefits of freight rail, the Commonwealth has invested in the Port and rail infrastructure across Virginia to support a more fluid freight network. Future passenger rail projects should include appropriate infrastructure to provide sufficient capacity for new passenger service and future freight demand without minimizing the public benefits of state investments or denigrating the freight rail network.

More frequent and higher speed passenger train service is a valuable goal that we support. However, without the necessary capacity, bottlenecks will exist, passenger and freight trains will be delayed, and state and regional economies will suffer.

Thank you in advance for considering our comments. We appreciate your outreach and look forward to your continuing partnership with the business community.

Sincerely,

 Barry E. DuVal
 President and CEO

919 EAST MAIN STREET, SUITE 900 RICHMOND, VIRGINIA 23219 804.644.1607 VACHAMBER.COM

VIRGINIA CHAMBER OF COMMERCE

1. The DC2RVA Project proposes to accommodate efficient movement of rail freight traffic in the DC2RVA Corridor. The Project's stated Purpose is to increase railroad capacity in the 123-mile corridor between Washington, D.C. and Richmond, VA, not only to deliver improved passenger rail service, but also to support the planned expansion of Virginia Railway Express (VRE) commuter rail service and accommodate the forecasted growth of freight rail service by developing an efficient and reliable multimodal rail corridor. Improvements to freight rail operations in the corridor would also encourage economic development by increasing freight traffic through Virginia's ports, and present an opportunity for greater diversion of freight transport from congested highways to rail.
2. The Department of Rail and Public Transportation (DRPT) conducted preliminary operations simulation modeling to estimate rail performance in the corridor, including impacts to freight rail. The preliminary operations simulation modeling has focused on verifying that the DC2RVA Project's proposed rail capacity improvements would meet the DC2RVA Project's Purpose and Need, and specifically would meet intercity passenger train and freight service performance goals established in the Passenger Rail Investment and Improvement Act (PRIIA).

The operations simulation modeling incorporated increases in freight train frequencies projected through the year 2045. To determine projected freight train growth for the operations simulations, DRPT used CSXT input derived from the U.S. Department of Transportation's Freight Analysis Framework (FAF) to forecast how rail freight traffic in the corridor would increase and change through the year 2045. While CSXT's actual freight growth may be greater or less than the projected growth rates based on market demands, both DRPT and the Federal Railroad Administration (FRA) concluded that the FAF provided a reasonable basis for estimating future freight movement.

Refer to Section 3.2 of the Final EIS and its Appendix F for details of the operations modeling process.



October 17, 2017

Mrs. Emily Stock
Manager Rail Planning
Department of Rail and Public Transportation
600 E Main Street, Suite 2102
Richmond, VA 23219

Dear Mrs. Stock:

The Virginia Maritime Association (VMA) represents over 450 member businesses directly and indirectly engaged in the flow of waterborne commerce through Virginia's ports. As the "Voice of Port Industries", representing these interested parties, we write to provide comment on the DC2RVA Environmental Impact Study that proposes to increase the frequency and speed of passenger train service in the Richmond to Washington, DC corridor. We appreciate efforts to provide improved passenger rail service in the Commonwealth and the opportunity to share our thoughts on this project.

VMA's mission is to "promote, protect and encourage international and domestic commerce through Virginia's ports." The Virginia maritime community is a vibrant, growing part of the state's economy and freight rail is an essential component of our industry. The DC2RVA rail corridor between Richmond and Washington, D.C. is part of the freight rail corridor that serves as a primary artery for moving goods between the Port of Virginia and markets in the Midwest.

The Port of Virginia and our members rely on efficient and reliable freight service in this corridor to compete and grow their business. We are concerned that increases in the number and speed of passenger trains without sufficient infrastructure to accommodate anticipated freight growth will constrain capacity, create bottlenecks, and disrupt service on which our members and their customers depend.

As the Commonwealth considers improvements to passenger service in Virginia, we encourage a comprehensive assessment of impacts to freight rail and taking steps to ensure efficiencies in the freight rail system that will meet the current and future needs to serve our member businesses and a growing Port of Virginia.

Sincerely,

David White
Vice President

P. O. BOX 3487 ♦ NORFOLK, VIRGINIA 23514-3487 ♦ PHONE (757) 622-2639 ♦
VAMaritime.com

VIRGINIA MARITIME ASSOCIATION

1. The DC2RVA Project proposes to accommodate efficient movement of rail freight traffic in the DC2RVA Corridor. The Project's stated Purpose is to increase railroad capacity in the 123-mile corridor between Washington, D.C. and Richmond, VA, not only to deliver improved passenger rail service, but also to support the planned expansion of Virginia Railway Express (VRE) commuter rail service and accommodate the forecasted growth of freight rail service by developing an efficient and reliable multimodal rail corridor. Improvements to freight rail operations in the corridor would also encourage economic development by increasing freight traffic through Virginia's ports, and present an opportunity for greater diversion of freight transport from congested highways to rail.

The Department of Rail and Public Transportation (DRPT) conducted preliminary operations simulation modeling to estimate rail performance in the corridor, including impacts to freight rail. The preliminary operations simulation modeling has focused on verifying that the DC2RVA Project's proposed rail capacity improvements would meet the DC2RVA Project's Purpose and Need, and specifically would meet intercity passenger train and freight service performance goals established in the Passenger Rail Investment and Improvement Act (PRIIA).

The operations simulation modeling incorporated increases in freight train frequencies projected through the year 2045. To determine projected freight train growth for the operations simulations, DRPT used CSXT input derived from the U.S. Department of Transportation's Freight Analysis Framework (FAF) to forecast how rail freight traffic in the corridor would increase and change through the year 2045. While CSXT's actual freight growth may be greater or less than the projected growth rates based on market demands, both DRPT and the Federal Railroad Administration (FRA) concluded that the FAF provided a reasonable basis for estimating future freight movement.

Refer to Section 3.2 of the Final EIS and its Appendix F for details of the operations modeling process.



18996

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Richmond, Virginia 23230
P: 804.864.5193 | F: 804.864.5194
VHSR.com

Linking Virginia with fast, frequent, safe, and reliable passenger rail service

November 7, 2017

Ms. Emily Stock
Manager of Rail Planning
DC2RVA Project Office
801 East Main Street, Suite 1000
Richmond, VA 23219

Re: Comments regarding the Washington to Richmond Tier II Draft Environmental Impact Statement

Dear Ms. Stock:

I am writing on behalf of Virginians for High Speed Rail (VHSR), the Commonwealth's largest rail advocacy organization who promote fast, frequent, and reliable intercity passenger rail service linking our communities to destinations across the nation. Thank you for the opportunity to submit our public comments regarding the Tier II Draft Environmental Impact Statement (DEIS) for the Washington, DC to Richmond High Speed Rail (DC2RVA) project.

Let me say first, and foremost, that we strongly believe that this study needs to be completed in a timely manner. It has been nearly a decade and a half since the federal Tier I of the DC2RVA study was completed, and nearly eight years since this study was funded. The time to get this done is now.

We realize, as has anyone who has ever traveled on I-95 between Washington, DC and Richmond, VA that the DC2RVA corridor is critical to the movement of people and freight throughout Virginia and along the eastern seaboard. It is a crucial segment of the Southeast High Speed Rail Corridor, as well as an important connector to the Northeast Corridor. Improving the Washington to Richmond corridor to high performance rail standards has to be one of the Commonwealth's top transportation priorities.

According to the Weldon Cooper Center at the University of Virginia, by 2040¹ the Commonwealth's Urban Crescent will be home to another 2.1 million Virginians. That's a 40.8 percent increase in population! If nothing is done this will likely result in a 1.7 million increase in registered vehicles, a 45.5 percent increase in highway traffic, a 29.6 percent increase in the amount of fossil fuels for transportation that are burned, and an increase of 7.2 million tons of green house gases released into our air.

Simply put, we must be prepared to do more if we don't want to end up with the top ten worst

VIRGINIANS FOR HIGH SPEED RAIL

(No comments on this page)

congestion points in the nation¹¹

The DC2RVA study is an important part of that process, and Virginians for High Speed Rail strongly supports the objectives of the DC2RVA study. We also support the Virginia Department of Rail and Public Transportation's draft recommendations overall.

Specifically we endorse VDRPT's recommendations for the Arlington, Northern Virginia, Fredericksburg, and Central Virginia segments of the corridor.

Hanover County and Town of Ashland

In regards to the Hanover/Ashland segment of the corridor, we think it is necessary to advance a plan that addresses the future need for increased capacity over the coming decades along the entire corridor.

Therefore, we believe that the "trench" option through Ashland should be further studied, modeled, and developed as a potential option for increased capacity. Doing so will allow the community, as well as local, state, and federal decision makers to have a complete understanding of the potential choices so that they may make an educated decision.

We also believe that the "3-2-3" option will create a bottle-neck down the road that has the potential to negatively impact passenger rail service on the entire east coast should anything unforeseen happen. There are no easy options to add capacity through Hanover County, however capacity must be added.

Richmond Region

We would like to offer several suggested modifications pertaining to the recommendations for the Richmond region. As a starting point, we understand that service in the Richmond region may never be considered "high-speed," but it can certainly be "high-performance"—meaning that there is reliable, highway-competitive passenger rail service available to multiple types of travelers.

As a result, we believe that the state should not cede access to the "A" line around downtown Richmond, as the draft recommendations suggest. Keeping access to the "A" line serves three significant purposes.

- First, it offers much needed redundancy in our passenger and freight rail network should some unforeseen occurrence inhibit the movement of trains via the "S" line.
- Second, with a passenger train envisioned to stop at Main Street Station every 38 minutes or so, it may not make sense to route all trains through downtown. Maintaining access to the "A" line will allow the state to incrementally increase routing via the "S" line to Main

VIRGINIANS FOR HIGH SPEED RAIL (continued)

1. Comment noted. The Draft Environmental Impact Statement (EIS) recommendations for the Arlington, Northern Virginia, Fredericksburg, and Central Virginia portions of the Project corridor were selected as the Preferred Alternative in the Final EIS.
2. The Town of Ashland/Hanover County Community Advisory Committee (CAC) considered a three-track trench through Ashland and identified this option as the "least objectionable" below-ground alternative. However, the Town of Ashland did not support the trench due to potential impacts to local businesses and the community during construction and impacts to the character of the Town after the trench is placed in operation.

Subsequently, in accordance with the September 2017 recommendation of the CAC (Appendix G of the Final EIS) and with the December 2017 resolution of the Commonwealth Transportation Board (CTB) (Appendix H of the Final EIS), Alternative 5A (the "3-2-3" option) was selected as the Preferred Alternative, which maintains the existing rail infrastructure through the Town of Ashland.

3. The Federal Railroad Administration (FRA) and DRPT, as discussed in Section 4.3.5 of the Final EIS, concluded that Alternative 5A (the "3-2-3" option) provides the railroad and roadway infrastructure required to support the railroad operations proposed in the DC2RVA Project. As presented in Chapter 5 of the Final EIS, Alternative 5A is expected to affect zero historic properties, as no additional infrastructure would be constructed within the Town of Ashland or outside of the CSXT railroad right-of-way through Hanover County, with the exception of two new highway-rail grade separations where Vaughan Road (Archie Cannon Drive) and Ashcake Road cross the corridor. Whereas all other alternatives considered in the Ashland/Hanover County Area would incur impacts to historic or protected resources; NEPA requires the selection of the "avoidance" alternative, which in this case would be Alternative 5A (Maintain Two Tracks Through Town).

(Responses are continued on next page)

congestion points in the nationⁱⁱ

The DC2RVA study is an important part of that process, and Virginians for High Speed Rail strongly supports the objectives of the DC2RVA study. We also support the Virginia Department of Rail and Public Transportation's draft recommendations overall.

Specifically we endorse VDRPT's recommendations for the Arlington, Northern Virginia, Fredericksburg, and Central Virginia segments of the corridor.

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In regards to the Hanover/Ashland segment of the corridor, we think it is necessary to advance a plan that addresses the future need for increased capacity over the coming decades along the entire corridor.

Therefore, we believe that the "trench" option through Ashland should be further studied, modeled, and developed as a potential option for increased capacity. Doing so will allow the community, as well as local, state, and federal decision makers to have a complete understanding of the potential choices so that they may make an educated decision.

We also believe that the "3-2-3" option will create a bottle-neck down the road that has the potential to negatively impact passenger rail service on the entire east coast should anything unforeseen happen. There are no easy options to add capacity through Hanover County, however capacity must be added.

Richmond Region

We would like to offer several suggested modifications pertaining to the recommendations for the Richmond region. As a starting point, we understand that service in the Richmond region may never be considered "high-speed," but it can certainly be "high-performance"—meaning that there is reliable, highway-competitive passenger rail service available to multiple types of travelers.

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- Second, with a passenger train envisioned to stop at Main Street Station every 38 minutes or so, it may not make sense to route all trains through downtown. Maintaining access to the "A" line will allow the state to incrementally increase routing via the "S" line to Main

VIRGINIANS FOR HIGH SPEED RAIL (continued)

4 and 5. DRPT Performed detailed operations analysis of the railroad network through the Richmond section of the DC2RVA Corridor, which supported the advancement of the alternatives shifting passenger service to the S-Line through Richmond. The forecasted growth in freight traffic through the corridor in the No Build Alternative and all considered Build Alternatives as evaluated in the Draft EIS demonstrated increased demand for freight capacity on the A-Line west of downtown Richmond; however, there is limited ability to increase capacity on the A-Line due to its constrained alignment in the median of I-195 and across the James River. Through physical survey and continued operations analysis, DRPT determined that the S-Line can accommodate the construction of additional capacity to support the reroute of existing and expansion of intercity passenger rail service proposed in the DC2RVA Project. Chapter 2.6 and Appendix I (Operations Modeling) of the Draft EIS provide additional information on the operations modeling process with regard to routing in and around Richmond. Section 3.2 of the Final EIS and its Appendix F provides details of refined operations modeling that has occurred since the publication of the Draft EIS.

DRPT agrees with Virginians for High Speed Rail in its assertion that the CSXT A-Line offers much needed redundancy in the Richmond area's passenger and freight rail network should unforeseen occurrences inhibit the movement of trains via the S-line. The infrastructure improvements included in the Preferred Alternative (6F: Full Service) do not preclude use of the A-Line by passenger trains in the event of unforeseen occurrences that would prevent the use of the S-Line for passenger service, or if desired by Amtrak under its statutory authority. Under the Preferred Alternative, Amtrak's Auto Train would continue to use the A-Line.

Street Station for Regional trains heading to Hampton Roads and Southeast Corridor trains to North Carolina. Amtrak's Auto-train and Long Distance trains are better suited to "A" line routings until the "S" line proves itself from both marketing and operating perspectives. Furthermore, we must resolve conflicts with freight traffic.

- Third, the right to use of the "A" line for passenger trains is grandfathered by the Rail Passenger Service Act of 1970 and is memorialized in 49 USC §24309ⁱⁱⁱ, which requires CSX maintain the "A" line to the original level of utility and if passenger service is to be relocated upon CSX initiative, the costs of relocation must be fully borne by CSX. If Amtrak voluntarily cedes use of the "A" line, even if at the Commonwealth of Virginia's request, CSX no longer has this statutory obligation. That means that the state with our limited resources is on the hook to pay for the capacity on the "S" line to accommodate the current long-distance trains, and the infrastructure maintenance to maintain their performance. These are invaluable resources and train slots that could have other better uses.

I would like to call attention to a couple of errors that we have identified in the draft document and its accompanying executive summary regarding the recommendation for the Richmond region.

- In the executive summary on page 63 & 64 it states that DRPT's preferred alternative is 6F which includes the following description on page 64 *"This alternative includes improvements between Greendale and Centralia along the S-Line, station and service improvements at Main Street Station, an additional bridge crossing of the James River, an east bypass of Acca Yard, and station and service improvements at Staples Mill Road Station. Interstate Corridor (SEHSR) and Northeast Regional (SEHSR and Virginia) to Norfolk passenger trains moving north-south through Richmond would be routed from Staples Mill Road Station to the west side of Main Street Station and then to Centralia using the S-Line. Interstate Corridor (Carolinian) and Long Distance passenger trains would be routed through Staples Mill Road Station to Centralia using the A-Line, bypassing Main Street Station. One Northeast Regional (SEHSR) round trip would terminate at Main Street Station. Northeast Regional (SEHSR and Virginia) service to Newport News would be routed from Staples Mill Road Station to the east side of Main Street Station on the S-Line, then continue on the Peninsula Subdivision".* Alternative 6F is full service through downtown with the interstate and long distance trains (except the auto-train which will continue to use the A-line) stopping at Main Street Station. This language should be corrected in the final draft, however we encourage you to consider amending your preferred routing to reflect our language above where priority for the S-line is give to SEHSR interstate and Virginia Regional trains, and all of the long-distance trans continue to use the A-line.
- Similar to error in the executive summary, in Chapter 2 titled "Alternatives" of the study on page 121 in chart 2.6-2 "DC2RVA Corridor Travel Times by Richmond Station Option, Washington Union Station to Richmond, VA" alternative 6F shows no interstate corridor service. This should be corrected in the final draft.

Overall Study

Additionally, we recommend that when the final set of recommendations are released for the

VIRGINIANS FOR HIGH SPEED RAIL (continued)

(Response to comment 5 on previous page)

6. Build-out of the proposed DC2RVA improvements and full implementation of proposed intercity passenger service is dependent on future state and federal funding, as described in Chapter 7 of the Final EIS (which has been added since the Draft EIS) to present information on future steps of the Project. Operating agreements for train slots on the CSXT-owned A-Line and S-Line, and along the entire DC2RVA corridor for planned future intercity passenger trains, would be the subject of future negotiations between CSXT, the Commonwealth of Virginia, and Amtrak, after the Project has final approvals and funding is available to support incremental final design and construction. DRPT recognizes Amtrak's statutory authority to operate over any route desired, subject to the jurisdiction of the Surface Transportation Board (STB); however, FRA and DRPT have defined the Preferred Alternative for the DC2RVA Project to provide the most feasible opportunity to construct, deliver, and sustain intercity passenger and freight train operations for the foreseeable future.
7. DRPT agrees that an incorrect summary of Build Alternative 6F with regard to service at Main Street Station was provided in the "Recommended Preferred Alternative" section of the Draft EIS Executive Summary (the full detailed descriptions provided in Chapters 2 and 7 of the Draft EIS were correct). The Draft EIS Executive Summary text has been corrected; refer to the errata table for the Draft EIS, which is Appendix A of the Final EIS. Additionally, DRPT has ensured that all descriptions of Alternative 6F are correct in the Final EIS.

The Build Alternative 6F and Build Alternative 6G rows in Draft EIS Table 2.6-2 were inadvertently switched; the data showing for Build Alternative 6F in the table is appropriate and accurate for Build Alternative 6G, and vice versa. This correction has been made in the Final EIS; refer to the errata table for the Draft EIS, which is Appendix A of the Final EIS.

(Response to comment 8 on next page)

DC2RVA corridor that those recommendations list specific near- and intermediate-term projects, along with their anticipated benefits and projected costs.

This will help to lessen the “sticker shock” from the price tag of the overall package of recommendations, highlight opportunities for valuable improvements that can be made without waiting for funding of the entire package, and allow for the completion of discrete pieces of the entire project as funding becomes available. In general, funding for projects should have criteria that can be prioritized, giving preference for safety-related or regulation mandated changes that may have enhanced opportunity for federal partnerships, followed by other factors such as improved on-time performance, passenger travel time savings, expansion of passenger rail service levels, and financial performance that considers capital cost, annual operating cost, and increased ridership revenue.

The Commonwealth has been successful in expanding its passenger rail network because of its focused, incremental approach which wisely balances public benefits with public investments. Until such a time that there is a federal rail program with adequate, sustainable, long-term funding, Virginia should maintain this strategy. The DC2RVA study offers us an opportunity to continue our progress building out our passenger rail network while establishing priorities for when we have an equal and willing federal funding partner.

Lastly, we do not take our words or requests lightly. If there were easy solutions to the issues that the study is trying solve, they would’ve been found already. What we cannot do is to stick our head into the sand and hope that some magical transportation miracle will happen because that has not served the commonwealth well over the previous decades.

The low hanging fruit has been picked. Now is the time to make those hard decisions for the greater good of the entire state with an eye toward the future.

On behalf of the Board, and membership, of Virginians for High Speed Rail I want to thank you again for the opportunity to comment on this study.

Sincerely,

Daniel L. Plaugher
Executive Director

¹ http://demographics.coopercenter.org/files/2017/06/VAPopProjections_Total_2020-2040_final.xls

² <http://www.foxnews.com/us/2017/09/28/worst-traffic-spot-in-us-found-on-95-in-northern-virginia.html>

³ <https://www.gpo.gov/fdsys/pkg/USCODE-2011-title49/pdf/USCODE-2011-title49-subtitleV-partC-chap243-sec24309.pdf>

VIRGINIANS FOR HIGH SPEED RAIL (continued)

8. Complete build-out of the corridor and full implementation of the DC2RVA improvements (and realization of all Project benefits) is dependent on future funding. DRPT anticipates the DC2RVA Project would be implemented incrementally, as funding becomes available. The funding for the Project is anticipated to come from multiple sources, including federal, state, and local funds, plus passenger fare revenue recovery and private sector sources. Subsequent to the Final EIS, DRPT is developing a Corridor Service Development Plan (refer to Section 7.3 of the Final EIS for details) that addresses likely phasing of improvements and Project benefits, including additional train service and improved reliability. This would not preclude upgrading stations, or constructing highway-rail grade separations or at-grade crossing improvements, independently of the DC2RVA Project, should federal, state, local, or other funding become available.