ATTACHMENT B

Agency Statements Expressing Opposition to Alternative B-CSX
that Alternatives B-CSX and D both represent more costly and time-consuming alternatives that should be rejected.

I want to thank the Panel for this opportunity to allow me to speak, and I ask for your support for Alternative B. Thank you.

MAYOR EUILLE: Thank you. Bryan Jungwirth, to be followed by Dino Drudi.

MR. JUNGWIRTH: Good evening. My name is Bryan Jungwirth, I'm the Government Relations and Public Affairs Director for the Virginia Railway Express and I'm speaking tonight to share the areas of concerns regarding the Potomac Yard Metrorail station alternatives considered in the Draft EIS, especially the Build Alternative B-CSX design option.

As you may know, VRE is a commuter rail provider; we operate 30 trains a day within the CSX right-of-way, between Alexandria and Washington, D.C., and we carry about 19,000 riders each weekday. It's a safe, reliable, and efficient alternative to driving for long distance
1 commuters.
2 Currently, VRE service removes the
3 equivalent of a lane of traffic on both I-95 and
4 I-66 travel corridors in the morning and evening
5 rush hours. On-time performance is at near record
6 highs with approximately 95 percent of the trains
7 arriving at their final destination within five
8 minutes of their scheduled arrival time. This is
9 very important to VRE riders as a top influencing
10 factor in their decision to ride on VRE. Any
11 actions that have the potential to degrade VRE
12 operations are of great concern.
13 We believe the CSX design option will
14 have a negative effect on VRE commuter rail
15 operations due to the impact of construction
16 activities within and adjacent to the CSX right-
17 of-way, combined with similar negative impacts to
18 Amtrak city trains, which also use the CSX right-
19 of-way, freight traffic and we believe the
20 railroad operations will therefore, be
21 significantly affected.
22 The Draft EIS indicates the realigned
CSX tracks would be constructed first and railroad traffic shifted to the new alternative or into the new alignment. Once the CSX tracks are complete, construction of the Metrorail station would begin. Primary access to the construction area is from the western side of the CSX right-of-way, across the active CSX track. While the DEIS does not indicate the length of the construction period for realigning the CSX track versus the Metrorail construction, the total construction period is estimated at two years.

Although the DEIS indicates the CSX design option will require extensive preplanned outages on the CSX track, it fails to evaluate the outages on railroad operations and the effects of daily unplanned stoppages of train traffic to allow construction workers, vehicles and equipment to cross the CSX right-of-way to access the Metrorail station construction site or the potential for the imposition of slow orders for trains operating within the CSX right-of-way for the duration of the construction period.
The uncertainty of the types and levels of potential construction impacts associated with the CSX design option and the lack of detailed evaluation of those impacts on railroad operations are serious concerns for VRE. The segment of track is used by all VRE trains and any activities that effect travel on the rail corridor can have a devastating effect on our operations.

Queueing of the trains through the construction site will become commonplace during the duration of the construction, due to the slow orders and so forth.

MAYOR EUILLE: Time's up.

MR. JUNGWIRTH: Okay. Thanks. I'll provide the rest in a written statement.

MAYOR EUILLE: All right. Next, we have Dino Drudi, followed by Aimee Custis.

MR. DRUDI: Thank you, Mayor Euille and Mr. Ashe. And thank you, Mr. Ashe, for that very succinct prof the entirety of the project and the EIS.

I have been a Metro rider for nearly all
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Comment

See copy of comment starting on following page
May 12, 2015

Potomac Yard
Metrorail Station EIS
PO Box 16531
Alexandria VA 22302

RE: Amtrak Comments
Metro Rail Draft EIS

Dear Sir/Madam:

Amtrak has reviewed the Draft Environmental Impact Statement for the Potomac Yards Metrorail Station. Amtrak operates over 20 trains per day on the CSX owned tracks that run through the study area.

Amtrak’s comments focus on construction sequencing of the selected alternative. We ask that our train schedules be considered during construction of any alternative so there is no impact on Amtrak operations.

Thank-you for your consideration of our comments.

Sincerely

Craig M Caldwell
Senior Manager, Environmental

cc: D. Galloway
    M. Sherlock
Good evening. My name is Bryan Jungwirth, I’m the Government Relations and Public Affairs Director for the Virginia Railway Express and I’m speaking tonight to share the areas of concerns regarding the Potomac Yard Metrorail station alternatives considered in the Draft EIS, especially the Build Alternative B-CSX design option.

As you may know, VRE is a commuter rail provider; we operate 30 trains a day within the CSX right-of-way, between Alexandria and Washington, D.C., and we carry about 19,000 riders each weekday. It’s a safe, reliable, and efficient alternative to driving for long distance commuters.

Currently, VRE service removes the equivalent of a lane of traffic on both I-95 and I-66 travel corridors in the morning and evening rush hours. On-time performance is at near record highs with approximately 95 percent of the trains arriving at their final destination within five minutes of their scheduled arrival time. This is very important to VRE riders as a top influencing factor in their decision to ride on VRE. Any actions that have the potential to degrade VRE operations are of great concern.

We believe the CSX design option will have a negative effect on VRE commuter rail operations due to the impact of construction activities within and adjacent to the CSX right-of-way, combined with similar negative impacts to Amtrak city trains, which also use the CSX right-of-way, freight traffic and we believe the railroad operations will therefore, be significantly affected.

The Draft EIS indicates the realigned CSX tracks would be constructed first and railroad traffic shifted to the new alternative or into the new alignment. Once the CSX tracks are complete, construction of the Metrorail station would begin. Primary access to the construction area is from the western side of the CSX right-of-way, across the active CSX track. While the DEIS does not indicate the length of the construction period for realigning the CSX track versus the Metrorail construction, the total construction period is estimated at two years.

Although the DEIS indicates the CSX design option will require extensive preplanned outages on the CSX track, it fails to evaluate the outages on railroad operations and the effects of daily unplanned stoppages of train traffic to allow construction workers, vehicles and equipment to cross the CSX right-of-way to access the Metrorail station construction site or the potential for the imposition of slow orders for trains operating within the CSX right-of-way for the duration of the construction period.

The uncertainty of the types and levels of potential construction impacts associated with the CSX design option and the lack of detailed evaluation of those impacts on railroad operations are serious concerns for VRE. The segment of track is used by all VRE trains and any activities that effect travel on the rail corridor can have a devastating effect on our operations.

Queueing of the trains through the construction site will become commonplace during the duration of the construction, due to the slow orders and so forth.
MAYOR EUILLE: Time's up.

MR. JUNGWIRTH: Okay Thanks. I'll provide the rest in a written statem&n
Comment ID    153
First Name    John C.
Last Name    Cook
Organization    Virginia Railway Express (VRE)

Collection Method    Email
Commenter Type    State Government

Comment
See copy of comment starting on following page
May 15, 2015

Ms. Terry Garcia Crews  
Regional Administrator  
Federal Transit Administration  
1760 Market Street  
Suite 500  
Philadelphia, PA 19103-4124

Mr. Mark Jinks  
Acting City Manager  
City of Alexandria  
301 King St.  
Alexandria, VA 22314

Dear Ms. Garcia Crews and Mr. Jinks:

Please accept the following comments from the Virginia Railway Express (VRE) regarding the Potomac Yard Metrorail Station Draft Environmental Impact Statement (DEIS). VRE is a commuter rail service operating 32 trains a day within the CSXT right-of-way between Fredericksburg, VA and Washington, D.C. that carry about 19,000 riders each weekday. VRE provides a safe, reliable and efficient alternative to driving for long-distance commuters and provides the equivalent capacity of a lane of traffic on the I-95/395 and I-66 travel corridors in the morning and evening commuting periods. On-time performance is extremely high with approximately 95 percent of trains arriving at their final destination within five minutes of their scheduled arrival time. This is very important to VRE riders who have identified it in customer surveys as a top factor influencing their decision to travel on VRE.

Any actions that have the potential to degrade VRE operations are troubling. I am writing to share VRE concerns regarding the Potomac Yard Metrorail station alternatives considered in the DEIS. We believe the Alternative B-CSX Design Option would have a substantial negative effect on VRE commuter rail operations due to the impact of construction activities within and adjacent to the CSXT right-of-way. Combined with similar negative impacts to Amtrak intercity trains, which also use the CSXT right-of-way, and freight traffic, the effect on railroad operations will be significant.

The Draft EIS indicates the realigned CSXT tracks would be constructed first and railroad traffic shifted to the new alignment. Once the CSXT track work is complete, construction of the Metrorail station would begin; the total construction period is estimated to be two years. Primary access to the construction area is from the western side of the CSXT right-of-way across the active CSXT tracks. Although the DEIS indicates B-CSX Design Option will require “extensive preplanned outages on CSXT track”, it fails to evaluate the effect of the outages on railroad operations or the potential for daily, unplanned stoppages
of train traffic to allow construction workers, vehicles and equipment to cross the CSXT right-of-way to access the Metrorail station construction site or the potential for the imposition of slow orders for trains operating within the CSXT right-of-way for the duration of the construction period.

The uncertainty of the types and levels of potential construction impacts associated with the B-CSX Design Option and the lack of detailed evaluation of those impacts on railroad operations are serious concerns for VRE. This segment of track is used by all VRE trains and any activities that affect travel in the rail corridor can have a devastating effect on VRE operations. Queuing of trains through the construction site would become commonplace for the duration of construction due to slow orders and/or temporary shutdowns of the railroad. Given the volume of rail traffic in the corridor, the effect of a single delay or stoppage is magnified and can have a cascading effect as one train after another is slowed. This will significantly degrade VRE on-time performance and customer satisfaction and ultimately reduce VRE ridership. VRE riders would likely revert to using single occupancy vehicles, since few long-distance transit alternatives exist, resulting in increased traffic congestion and worsening of air quality in the region.

As an illustration of the effect railroad construction can have, extensive CSXT and Norfolk Southern track work in 2005 and 2006 had a significant, negative effect on VRE on-time performance. VRE on-time performance dropped to a low of 50% on the CSXT-Fredericksburg Line. On the Norfolk Southern-Manassas Line on-time performance dropped to 68% during track construction. The impact of the decline in on-time performance was seen directly in VRE ridership which deceased by seven percent and took two years to recover to where it was prior to the start of the track work. With on-time performance currently averaging 95 percent, the ability to sustain that level of reliability is critical to VRE’s viability as a regional transportation option. I urge the Federal Transit Administration and the City of Alexandria to eliminate the B-CSX Design Option from consideration for the Potomac Yard Metrorail station.

While the B-CSX Design Option poses the greatest potential negative impacts to VRE operations, Alternatives A, B and D also have the potential to effect train operations in the CSXT right-of-way during construction. I ask that the evaluation of the construction impacts of those alternatives be expanded to provide a more detailed discussion of the effects on train operations within the CSXT right-of-way. In particular, the expected impact of the construction access easement required for Alternative B across a portion of the CSXT right-of-way to enable construction vehicles to get around the west side of the Metrorail traction power station adjacent to the CSXT tracks should be evaluated (e.g., timing, frequency and duration of use). While this easement would not cross the CSXT tracks, its use by construction vehicles will likely affect rail operations. Greater detail on the effect of construction of the pedestrian bridges over the CSXT tracks (and Metrorail tracks in Alternative D) on rail operations should also be provided.
Finally, as the design and construction of the selected Locally Preferred Alternative is advanced, all efforts should be made to avoid and minimize effects on the CSXT right-of-way and train operations. Ongoing coordination should be maintained with VRE, as well as CSXT, to ensure information regarding planned or unplanned rail traffic stoppages or slow orders is available to VRE operations personnel.

Thank you for the opportunity to share VRE concerns regarding this project.

Sincerely,

John C. Cook
VRE Operations Board Chairman

JCC:cmh

c: Members of the Alexandria City Council
    Members of the VRE Operations Board
    Ms. Melissa Barlow, Federal Transit Administration
    Ms. Lee Farmer, City of Alexandria
    Mr. Bryan Rhode, CSXT
    Ms. Kelley Coyner, NVTC
    Mr. Eric Marx, PRTC
Appendix F - Comments Submitted for Public Record (without annotations)

Comment ID 166; Excerpts of this comment are referenced in Chapter 5 separately under Comment ID 180 to 202 and 204 to 2014

First Name Bettina
Last Name Sullivan, Program Manager Environmental Impact Review and Long-Range Priorities
Organization Virginia Department of Environmental Quality (DEQ) with consolidated comments by:
- Department of Historic Resources
- DEQ, Office of Air Quality
- DEQ, Northern Virginia Office
- Department of Conservation and Recreation, Division of Natural Heritage
- Department of Forestry
- Department of Health, Office of Drinking Water
- Department of Rail and Public Transportation
- Department of Transportation, Northern Virginia District

Collection Method Email
Commenter Type State Government

Comment
See copy of comment starting on following page
MEMORANDUM

TO: Charles Ellis III, Department of Environmental Quality
FROM: Amy Inman, Planning & Mobility Programs Administrator
DATE: May 4, 2015
SUBJECT: Potomac Yard Metrorail DEIS Comments

This memo summarizes comments from the Department of Rail and Public Transportation (DPRT) regarding the Draft Environmental Impact Statement (DEIS) for the proposed Potomac Yard Metrorail station in Alexandria, VA. DRPT is a participating agency in the DEIS and the state agency responsible for improving access for the general public and businesses in the Commonwealth through increased transportation choices (including transit and passenger rail) and providing access improvements to Virginia’s railways to encourage economic development and reduce traffic on Virginia’s highways. DRPT provides annual operating and capital assistance to the Washington Metropolitan Area Transit Authority (WMATA), the Virginia Railway Express (VRE) and the City of Alexandria through the Northern Virginia Transportation Commission (NVTC). DRPT also provides rail enhancement and industrial access grants to CSX as well as operating and capital funding to both Amtrak and CSX on an annual and multi year basis. Finally DRPT is preparing a Tier II Environmental Impact Statement (EIS) for the Southeast High Speed Rail corridor between Washington, DC and Richmond, which will serve Alexandria. Finally DRPT notes that the City of Alexandria has consulted with CSX and commends the City for developing Alternative B-CSX in developing the conceptual plans for this alternative.

Currently there are 4.5 long distance Amtrak daily round trips (9 trains) and 7 regional, state supported daily round trips (14 trains) for a total of 11.5 round trips or 23 trains per day (the Cardinal operates three times per week for a 0.5 round trip). On the Virginia Railway Express, which receives state funding for capital and operations, there are 7 round trips (14 trains) on the Fredericksburg line and 8 round trips (16 trains) on the Manassas line for a total of 15 round trips or 30 trains per day. Both VRE lines and all Amtrak trains utilize the segment of track adjacent to the proposed Potomac Yard Metrorail station. In FY15, DRPT provided $9.0 million in operating assistance and $13.0 million in capital assistance to VRE.
In FY15, DRPT provided $170,000 in state funding to the City of Alexandria for the preparation of a bid package for the Potomac Yard Metro station and $6.39 million in state and federal funding to VRE for track lease payments to CSX. In the current draft of Six Year Improvement Program (SYIP), DRPT anticipates providing $8.86 million in state and federal funding to VRE for the CSX track lease. Neither NVTC nor the City of Alexandria have requested DRPT funding for the Potomac Yard Metrorail station however the project is included in DRPT's FY15-20 SYIP for an estimated $306 million total cost in FY17.

DRPT believes the project adequately addresses the Purpose and Need. DRPT notes that the No Build alternative would not meet the Purpose and Need and agrees that traffic congestion would worsen significantly under this alternative. Additionally the Potomac Yard Metrorail station will be good for the economy of Alexandria, Northern Virginia and the entire Commonwealth of Virginia. Investment in transit promotes economic development. According to the American Public Transit Association, $1 in spending on transit returns $4 in economic benefit and every $1 billion spent on transit capital supports 16,000 jobs. Based on the DRPT SYIP costs, this project would generate 4,900 jobs and $1.2 billion in economic benefit. The City's own economic impact analysis shows the station will generate as much as $2 billion in additional tax revenues which can support additional services and benefit residents above the cost of constructing the station.

In January 2015, the Commonwealth Transportation Board approved a $50 million loan from the Virginia Transportation Infrastructure Bank (VTIB) to the project. The project is estimated to generate between 9.3 million and 13.1 million square feet of development and anticipates receiving donated property for the station from developers as well as developer contributions and shortfall guarantees. DRPT also agrees with the statement in the DEIS that the project is also financially feasible. In addition to the DRPT SYIP, it is also included in the Metropolitan Washington Council of Government's 2040 Constrained Long Range Plan (CLRP) and the Northern Virginia Transportation Authority's (NVTA) 2040 TransAction plan. The environmental work was funded in NVTA's 2014 program and the project has been submitted for project development funding and development of a design-build package in response to NVTA's 2015-16 call for project.

While the low conceptual cost estimate of all four alternatives in the DEIS falls within the cost in the DRPT FY15-20 SYIP, only Alternatives A and B fall completely within the DEIS high conceptual cost estimate. Additionally Alternative B has fewer vibration impacts and greater economic development benefit than A (and is also the only alternative that generates more development than the No Build). DRPT also notes that Alternative B has a greater amount employment more residents within 0.25 miles of the station than Alternative A (as
well as B-CSX and D) and diverts more auto trips than any of the other alternatives. It is also the only alternative consistent with Alexandria’s local plans. Thus DRPT recommends Alternative B although noting that Alternative A would also be acceptable.

DRPT is strongly opposed to Alternative B-CSX and Alternative D, believes neither are financially feasible and recommends setting both aside. Both alternatives have significantly more land acquisition and would require a significant realignment of the Metrorail Yellow and Blue Line tracks that could likely delay the current 2021 projected completion. These two alternatives would also have significant negative impact on VRE’s operation during construction. While temporary construction impacts are evaluated, the DEIS does not assess the impact on VRE. While the Technical Memorandum in Appendix 18 addresses CSX operation it does not adequately assess the construction impacts on freight or passenger rail operation. For example if slow orders or stoppages are issued for passenger trains, on time performance for VRE would be negatively impacted and ridership would likely decrease. Would all three existing tracks remain in operation outside of temporary stoppages during construction? What degree of temporary stoppages would be issued during construction? If Alternative B-CSX or D is chosen, the construction impacts on VRE and freight rail should be fully evaluated during the FEIS and every attempt to mitigate adverse impacts should be included in the Record of Decision.

Regarding the Washington, DC to Richmond segment of the Southeast High Speed Rail project that DRPT is managing (www.DC2RVARail.com), our proposed alignment alternatives would work with any of the four Potomac Yard alternatives identified within the DEIS. Potomac Yard Alternatives A, B and D shows no change to the CSX track alignment, but our proposed alignment alternatives shows some slight straightening to improve speed.

The Potomac Yard EIS Alternative B-CSX is the only one that straightens out the CSX track geometry significantly such that it may allow for a greater speed compared to that shown on our proposed alignment alternatives. Because of the long tangent shown on the Potomac Yard DEIS Alternative B-CSX Alternative, there is a potential to add a new Amtrak/VRE station stop at this location if desired. Currently however there are no plans for a Potomac Yard Amtrak or VRE station and DRPT’s earlier comments in this memo opposing Alternative B-CSX still stand. Since the area will have a direct connection from the King Street Metrorail station which is a transfer from Amtrak and the Crystal City and L’Enfant Plaza Metrorail stations which have transfers from VRE, DRPT does not foresee a need for a future Amtrak or VRE station at Potomac Yard.

The project engineering team from HDR reviewed the alternatives and noted the vertical clearance over CSX is not correct. It is shown as 23’, but should be 24’-3” for new structures over CSX. The design criteria accounts for a “future” CSXT track (40’ total – 15’ from centerline of track to future and 25’ to pier/crash wall)
Lastly DRPT also encourages the City of Alexandria and WMATA to consider multimodal access to the station. DRPT understands that the proposed station is an urban infill and does not require daily long term parking. While it appears that pedestrian access is adequate from the conceptual design plans, full consideration should be given to adding bus bays and bike parking. Short term bike parking should be covered and bike lockers should be considered for monthly storage. Bus bays should have static information displays (such as route or system maps, fare, schedule and customer service information) as well as real time arrivals. If the station footprint does not allow for off street bus access, on street bays could be constructed on Potomac Avenue. This would allow the Metroway Bus Rapid Transit to serve the future station as well as allow a layover for Alexandria Transit (AT) routes 9 and 10 if they were extended to the station, which DRPT recommends. DRPT also recommends that consideration be given to routing Metrobus route 9A and AT route 4 to the future station. Lastly DRPT notes that the station would also provide greater access to employment and shopping in Potomac Yards for residents of the Route 1 corridor in south Fairfax County who currently only have access via local bus service. DRPT conducted a Multimodal Alternatives Analysis between the Alexandria limit and Woodbridge that concluded in October 2014 with a recommendation for a three phased BRT, with the first phase between Huntington and Hybla Valley completed by 2025.