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Rail Solution commends DRPT for its excellent and thorough development of the draft Virginia State Rail Plan.

As recently as 2008 we submitted largely unfavorable comments because then the Plan was little more than a wish list for the railroads in Virginia, with little regard for a public interest dimension and no consistent vision for the future.

Now, however, many of our earlier comments have been addressed and stakeholder input incorporated. This new document does a good job of setting out a list of needed rail improvements through 2040 in Virginia and detailing the rail funding needed to bring such projects to fruition.

Rail Solution supports DRPT's focus on rail investments in shared infrastructure than can benefit both passenger and freight transportation.

We are, however, unwilling to agree that 90 mph passenger trains cannot be operated on freight railroads, or that electrification of such lines is incompatible with freight operations. Norfolk Southern operates freight trains (diesel powered) on the electrified Northeast Corridor with no apparent problems, and such trains use the same tracks as 125-mph passenger trains. Mainline electrification, especially those with high density freight and passenger operations, will become increasingly vital in the future and can be a key contribution to reduced oil dependency in the state's transportation sector.

We do concur with the design parameter suggested by CSX that passenger stops be designed with station tracks that allow the trains to clear the main tracks during the station dwell time.

We furthermore suggest that goals for the future include intermodal freight concepts such as roll-on roll-off configurations to allow access for the widest possible range of equipment – including small trucking businesses and owner/operators – and maximize efficient long distance freight diversion from the interstates.

DRPT's corridor by corridor focus is also very helpful. And it is good to lay out all the needs even though they vastly exceed available funding. As Virginia builds on its rail success story, pressure will mount to increase rail appropriation, especially where rail has the ability to provide needed capacity with lower life-cycle costs and impacts than other modes.

There is a lot here for the public to be excited about. One thing that might help is more post-audit of taxpayer-assisted projects. Be more proactive telling the public how many more riders there are, how many fewer trucks on parallel highways, how much fuel has been saved and pollution reduced. If there are data relating highway deaths and injuries to truck miles traveled, show how diverting freight to rail has enhanced safety and saved lives.

Rail Solution also strongly endorses the following from the draft Plan:

→ Multimodal emphasis in capacity additions. "Adopt a mode-neutral, results-based approach to transportation funding, specifically for corridor-wide investments. In the case of planning for corridors of statewide significance (COSS), begin with an overall framework plan to guide improvements that allows the flexibility to choose the best-fit modal option(s)." [page 6-2]

→ Environmental stewardship. "Taking vehicles off the road with expanded rail service is inherently beneficial to the environment, as evidenced by lower emissions, higher fuel efficiency, and overall smaller environmental footprint of freight and passenger rail." [page 6-9]

→ Mobility, connectivity, and accessibility. "Each initiative listed in the Rail Resource Allocation Plan shares mobility, connectivity, and accessibility as a primary goal... Offering expanded freight and passenger transportation options to the corridors with the highest density and growth potential is paramount in the selection of projects that range from allowing for double-stacked freight containers to creating additional passenger rail frequencies on heavily traveled passenger rail routes to the NEC." [page 6-9]

→ Importance to economic growth. Section 6-2-2 describes well the pivotal role that rail plays in the economic growth and development of Virginia.

→ Shared Infrastructure. "The recommended projects are consistent with the Commonwealth's goals as well as DRPT's approach of making incremental investments that benefit both passenger and freight rail." [page 5-1]

→ Support for new passenger service. [page 5-3]

Phase I—Capital: \$103.7 M total project cost

Capacity improvements and Amtrak capital equipment to support expanded intercity passenger service

Phase II—Capital: \$128.4 M total project cost

Capacity improvements to extend passenger service to □ Roanoke

Phase III—Capital: \$47.7 M total project cost

Capacity improvements to extend passenger service to Bristol

Phase IV—Capital: \$91.3 M total project cost

Capacity improvements and □ additional train sets to accommodate two roundtrip trains to Lynchburg

Phase V—Capital: \$110.0 M total project cost

Capacity improvements and additional train sets to accommodate two roundtrip trains to Bristol

Phase VI—Capital: \$24.5 M total project cost
Capacity improvements to establish passenger service from Lynchburg to Richmond”

→ New funding sources for rail. “Raise the fuel tax to better support rail projects and index fuel tax to inflation. Allocate a larger share of the general sales tax toward transportation, including rail.” [page 6-2]

Here are some special points in the text of the draft Plan that we found to be particularly useful:

- p. 2-19 - Average Annual Daily Travel with truck percentages for Virginia interstates - 2009 data
- p. 2-29 - at the bottom - documenting state rail capacity restraints
- p. 2-30 - discussion of railroad indemnification (to hold harmless) for expansion of passenger service, could open the door to discussion of similar partial indemnification for meeting other public needs such as expanding capacity and operating new services specifically to reduce highway congestion -- e.g.: open intermodal
- p. 2-33 - nice Amtrak ridership chart
- p. 2-37-38 - chart of relative fuel efficiency of rail passenger & freight traffic - particularly interesting to see this passenger data
- p. 3-38-39 - STRACNET in Virginia
- p. 4-8-9 - PRIIA federal funding
- p. 4-10 - Sec. 4-10 highway grade crossings program - 90% federal funding to consolidate, eliminate or improve grade crossings - receives \$4.5 million per year. The program is administered by VDOT.
 - RRIF funding acknowledged along with the following funding sources
 - Congestion Mitigation Air Quality - 80% federal funds
 - Surface Transportation Program - 80% federal funds
 - Transportation Alternatives Program
- p. 6-5 - map of regional distribution centers opened in past 10 years
- p. 6-9 - Environmental stewardship
Taking vehicles off the road with expanded rail service is inherently beneficial to the environment, as evidenced by lower emissions, higher fuel efficiency, and overall smaller environmental footprint of freight and passenger rail.

In conclusion, the draft Plan pulls together in one spot much useful information on the future freight and passenger rail needs in Virginia. It can be an important resource, as no doubt intended, for both the novice unfamiliar with the subject and the seasoned transportation professional.