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October 16, 2013

National Capital Region Transportation Planning Board

The Honorable Scott York, Chair

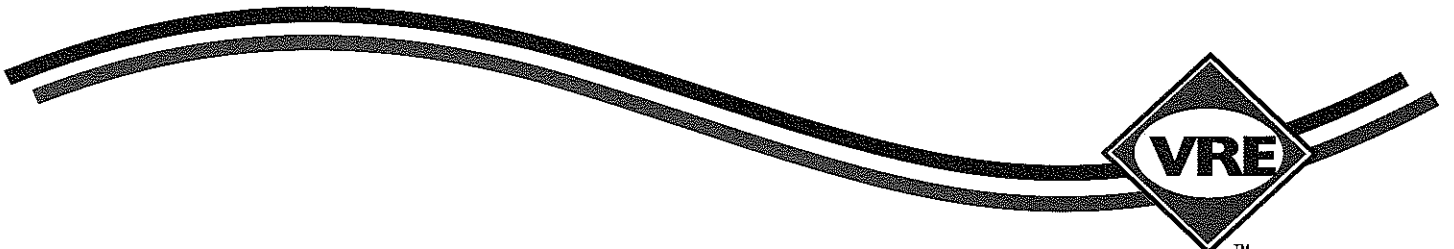
777 North Capitol Street NE, Suite 300

Washington, DC 20002-4239

Dear Chairman York:

The revised Regional Transportation Priorities Plan (RTPP) provides a more balanced look at the regional transportation system and generally acknowledges the needs of all components of the regional system when discussing challenges such as state of good repair. The Plan still falls somewhat short in its purpose of identifying key transportation strategies that offer valuable potential contributions to addressing continuing regional challenges. The recommended priorities remain solely focused on Metro while ignoring other system needs and opportunities that also contribute to solving regional challenges. For example:

- Priority One, Strategies that Address Metro and Highway Repair Needs, overlooks the need to maintain the entire regional transit network, not just Metro, in order to ensure the performance of that network. The statement that Metro and highway maintenance should be given the highest priority in (CLRP) program development and "*allocation of funding*" raises concern. MAP-21 State of Good Repair (SGR) provisions apply to all transit agencies. While the RTPP may suggest Metro repair as a priority, federal SGR funds are allocated to regional agencies based upon service operated in the region and is critical to each agency meeting MAP-21 mandates. To suggest SGR funding be allocated to Metro ignores other transit agency contributions to the region and their own needs. RTPP Priority One should be broadened to "Strategies that Address Transit and Highway Repair Needs" and references to "Metro" should be broadened to "Metro and other transit systems".
- Priority Two: Strategies that Address Transit Crowding and Roadway Congestion calls for a mix of supply and demand side strategies and a multi-modal approach, noting "for the system to function well overall, all of the component parts must function well." In discussing the need for increased rail capacity, however, the plan notes "long-term investments in increased capacity of the rail and bus network, including eight-car Metro trains, station enhancements, and bus rapid transit on express toll lanes."



This statement should be revised to highlight additional long-term investments that provide the recommended multi-modal approach and address all system components including “long-term investments in increased capacity of the rail and bus network, including eight-car Metro trains, **expanded VRE and MARC commuter rail capacity**, station enhancements...”

- WMATA’s Momentum strategic plan is referenced in relationship to the RTPP. VRE is currently developing a System Plan which is an update to the 2004 Strategic Plan. MARC’s Growth and Investment Plan Update was recently released in draft form. In keeping with the RTPP call for a multi-modal approach, these plans addressing the other components of the regional rail network should also be referenced relative to the RTPP.

The RTPP’s discussion of Goals and Strategies from which the plan Recommendations are drawn also retains the relatively narrow focus of the earlier RTPP draft plan. Expansion of Goal Six, Support Inter-regional and International Travel and Commerce, is suggested to more accurately depict the challenges related to this goal. While the plan touches briefly on the impact of freight-passenger rail bottlenecks in the Southwest Washington, DC rail corridor (e.g., Potomac River to Virginia Avenue Tunnel) due to the Virginia Avenue Tunnel capacity constraints, a more effective depiction of the current challenge should reference the capacity constraints of the Long Bridge. Those constraints have as significant an impact on the current and future growth of regional commuter/intercity passenger rail as Metrorail capacity needs do on that systems growth. The RTPP is the appropriate forum to highlight a critical need such as additional rail capacity across the Potomac River.

Finally, the RTPP advocates for smart transportation decision-making and emphasizes the “need to make better use of the infrastructure that is already in place.” Underplayed in the RTPP goals and strategies is a major, existing transportation infrastructure element: the commuter/passenger rail-freight rail network. The potential exists to grow the capacity of that network to respond to long-term regional growth and economic expansion without having to acquire significant additional new right-of-way or taking capacity away from other modes.

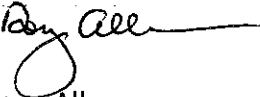
Referencing commuter rail capacity improvements among a general call for more transit capacity in Scenario B understates the potential role a mature commuter rail network can play in supporting long-term regional growth and improving mobility. As with BRT and Express Lanes, an expanded, interconnected commuter rail network is a new way of looking at an established component of the region’s transportation network. And, as with those modes, while expansion of the commuter rail network is not something that can be accomplished

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quickly and requires considerable investment, the benefits that can be realized are on a par with the other RTPP long-term strategies and should be singled out as an independent strategy.

Thank you for the opportunity to comment on the RTPP. If you have any questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink that reads "Doug Allen". The signature is fluid and cursive, with a large loop under the "D".

Doug Allen
Chief Executive Officer

DA:cmh

cc: VRE Operations Board
Ron Kirby, Director, MWCOG Department of Transportation Planning
Kelley Coyner, Northern Virginia Transportation Commission
Al Harf, Potomac and Rappahannock Transportation Commission
Marty Nohe, Northern Virginia Transportation Authority