

Southeast High Speed Rail: Tier II Draft Environmental  
Impact Statement & Draft Section 4(f) Evaluation

**HRTPO STAFF TECHNICAL COMMENTS**

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**PREPARED BY:**

Hampton Roads Transportation Planning Organization Staff  
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## **Introduction**

The purpose of this document is to provide written technical comments pertaining to the Southeast High Speed Rail Corridor: Tier II Draft Environmental Impact Statement (DEIS). The document was prepared by Hampton Roads Transportation Planning Organization (HRTPO) staff with additional review and input from the HRTPO's Transportation Technical Advisory Committee (TTAC), which is technical staff from the HRTPO local governments and public agencies. The document is arranged according to DEIS document chapter.

For questions regarding the enclosed comments, please contact Camelia Ravanbakht, Ph.D., Deputy Executive Director of the Hampton Roads Transportation Planning Organization (HRTPO), at [cravanbakht@hrpdcva.gov](mailto:cravanbakht@hrpdcva.gov) or via phone at (757) 420-8300.

## **Considerations Regarding the Richmond/Hampton Roads Passenger Rail Project**

The Southeast High Speed Rail (SEHSR) is a passenger rail project that will operate between Richmond and Petersburg, Virginia. It is within this same corridor that the Richmond/Hampton Roads Passenger Rail project will also operate within. As a federally designated segment of the Southeast High Speed Rail Corridor, the Richmond/Hampton Roads Passenger Rail project needs to be considered in the drafting of the Tier II DEIS of the SEHSR. The importance of the impacts and alternatives considered for the SEHSR between Richmond and Petersburg is of utmost concern to the Richmond/Hampton Roads Passenger Rail project, that the Tier I DEIS of the Richmond/Hampton Roads Passenger Rail project mentioned that alternatives and station considerations in the Richmond and Petersburg corridor are deferred to the outcome and considerations of the SEHSR Tier II DEIS. Furthermore, with the SEHSR and the Richmond/Hampton Roads Passenger Rail project sharing a concurrent corridor through Richmond and Petersburg, the SEHSR Tier II DEIS should reflect impacts downstream on the Richmond/Hampton Roads Passenger Rail project, as it relates to impacts and considerations taken for the SEHSR between Richmond and Petersburg.

## **Summary of Staff Comments**

Beyond the above considerations for the Richmond/Hampton Roads Passenger Rail project, which are referenced throughout the following comments in this document, the SEHSR Tier II DEIS addresses detailed environmental impacts along the project alignment to the best of its ability. Of concern with the document remains with issues such as the definition and explanation of alternatives across the various project segments, overview of all capital and operating costs of the project, discussion of the project as it relates to STRACNET, and the inconsistency of local and regional citation of the SEHSR project. As it related to public involvement and agency coordination, the metropolitan planning organizations (MPOs) along the project corridor should have been engaged in the planning and development stage of the project, versus the public comment period. Concern also lies in the level of outreach towards minority and disadvantaged enclaves in the corridor population.

## HRTPO STAFF COMMENTS

Comments are cited by Chapter-Page (Section [Chapter.Section.Subsection.Secondary Subsection]) (i.e. ES-5 (Section 1.3))

### SECTION: EXECUTIVE SUMMARY

#### HRTPO Staff General Section Comments:

- The document should incorporate all known cost figures into the entire document.
- For clarity, please label the portion of any table which continues to the page after the page at which the table began as “Continued”, e.g. “Table ES-21, Continued” on page ES-34.

#### **ES-2 (Study Corridor): *“There are three alternatives in each section.... In many areas, the alternatives are concurrent.”***

HRTPO Staff Comment: By “areas” do you mean “sections”? It appears that where three alternatives are “concurrent”, there is only one alternative. If that is the case, then there are NOT “three alternatives in each section”. Please revise the report and tables to show the actual number of alternatives for each section.

#### **ES-3 (Figure ES-1)**

HRTPO Staff Comment: Please explain what “*Not Carried Forward*” means.

#### **ES-5 (Rail Alignments): *“The maximum authorized speed (MAS) is established as 110 miles per hour (mph) using fossil fueled locomotion.”***

HRTPO Staff Comment: Is the maximum authorized speed set in stone? Will there be future considerations for 150+ mph rail service along the alignment?

#### **ES-5 (Rail Alignments): *“2) Centralia to Collier, VA (approximately 18 miles) - new track, 30 feet to the east of the existing main line track, MAS 90 mph with full grade separation.”***

HRTPO Staff Comment: Why grade separated and separate track for 90 mph rail service? Congested corridor? If investing in a separate infrastructure that will be grade separated, why is the MAS so low?

#### **ES-5 (Rail Alignments): *“3) Collier to Raleigh, NC (approximately 133 miles) - new single track, with 5 mile long sidings every 10 miles (approximate), MAS 110 mph, with full grade separation (Note: Speeds above 90 mph are subject to CSX approval).”***

HRTPO Staff Comment: Why, if new single track, is MAS capped at 110 mph and requires CSX approval? Will they be using this new track?

**ES-5 (Rail Alignments):** *“Within each of the 26 sections, the three project alternatives are labeled” 1, 2, or 3.*

HRTPO Staff Comment: Please explain here to the reader that—given the common end points of the alternatives for each section—the selection of an alternative for one section does not impact the selection of an alternative for another section. Please explain that, for example, there is no relationship or similarity between alternative “VA1” on one section and alternative “VA1” on another section, that each VA1 is simply the first alternative for that section. Please explain that selecting, for example, VA1 is not a presented option for the Virginia portion of corridor, that, instead, selecting VA1 is a presented option for section AA, for example.

**ES-6 (Service):** *“Proposed service consists of four round trips per day between Washington, DC, and Charlotte, NC, and four additional round trips between Raleigh, NC, and Charlotte, NC.”*

HRTPO Staff Comment: Is the document referring to initial service in this statement?

**ES-6 (Service):** *“The conventional service would allow additional stops in the smaller towns along the corridor.”*

HRTPO Staff Comment: What is defined as conventional passenger rail service in the context of this project?

**ES-6 (Summary of Impacts for Alternative Alignments)**

HRTPO Staff Comment: Explain in this section that no totals by alternative 1, 2, and 3 are shown on the following tables because a different alternative may be chosen for each section, i.e. VA1 may be chosen for section AA and VA2 may be chosen for section BB.

**ES-7 thru ES-10 (Tables ES-1 thru ES-7)**

HRTPO Staff Comment: Please remove the min/max subtotals from these tables because their existence implies to the reader that the same alternative (e.g. VA1) must be chosen for the handful of sections under which subtotals are provided. Because 1) the reader naturally will, as stated above, be inclined to think that there are only a few overall alternatives for this study, and 2) these are the first tables encountered by the reader of the executive summary, it is particularly important that these subtotals be removed. In addition, because an alternative must be chosen for each section, these max/min subtotals have little or no use for the reader.

**ES-12 (Highway Vehicle Operations): “...the microscale analysis for CO showed little or no change in those concentrations for the worst-case intersections.”**

HRTPO Staff Comment: Since the project reduces VMT, why does the DEIS examine CO concentrations from highway/highway intersections? Also, please fully label the intersections in Table ES-12 (i.e. is “New Hope Church” actually a street, e.g. “New Hope Church Road”?).

**ES-27 (Table ES-18)**

HRTPO Staff Comment: Over what time period are the shown dollar impacts realized?

**ES-36 (Historical Resources)**

HRTPO Staff Comment: Are there any battlefields in North Carolina?

**ES-37 (Rail)**

HRTPO Staff Comment: Please identify the impact which each alternative on section CC (Petersburg area) would have on 1) the cost of the Norfolk-to-Petersburg improvements and 2) the Norfolk-to-Richmond travel time of the rail improvements recently selected by the CTB from the Tier I DEIS for the Richmond Hampton Roads Passenger Rail Project.

**ES-37 (Stations)**

HRTPO Staff Comment: Please identify the impact which each of the three “potential station locations” in Petersburg would have on 1) the cost of the Norfolk-to-Petersburg improvements and 2) the Norfolk-to-Richmond travel time of the rail improvements.

**ES-38 (Parks, Recreation Areas, Wildlife Refuges)**

HRTPO Staff Comment: Instead of “no Section 4(f) use” did you mean “no Section 4(f) impact”?

**ES-39 (Table ES-23)**

HRTPO Staff Comment: Please provide a written introduction prior to this table and a written recap following this table. In the recap, please explain to the reader that no simple total page for Table ES-23 is shown because a different alternative may be chosen for each section. In order, however, that the reader may get an idea of the magnitude of the overall impact and cost of this project, please add a one-page “average total” table (i.e. Table ES-24) showing the sum (over 26 sections) of the average values (over the 3 alternatives for each section) by Topic. (Note that Limiting Speed and Operability/Constructability would be omitted from, or shown as “n.a.” in, this table because they are not additive.).

## **HRTPO STAFF COMMENTS**

Comments are cited by Chapter-Page (Section [Chapter.Section.Subsection.Secondary Subsection]) (i.e. 3-4 (Section 3.1.4.1))

### **SECTION: CHAPTER 1**

**1-10 (Need for the Proposed Project):** *“Population and economic growth rates in VA and NC have been higher than national averages over the past several decades and are projected to remain high over the next few decades.”*

HRTPO Staff Comment: From what cited report does this assertion come from?

## HRTPO STAFF COMMENTS

Comments are cited by Chapter-Page (Section [Chapter.Section.Subsection.Secondary Subsection]) (i.e. 3-4 (Section 3.1.4.1))

### SECTION: CHAPTER 2

#### **2-44 (Section 2.2.2.3.1): Conformity with Local Plans/Local Support**

HRTPO Staff Comment: Is there any consideration of the alternatives for the Richmond/Hampton Roads project? And if these are the alternatives considered but dropped, why were they brought up again as local alternatives for the Richmond/Hampton Roads project in that Tier I DEIS, which is dated after the Record of Decision for the Tier I DEIS for the SEHSR?

#### **2-44 (Section 2.2.2.3.5): Engineering Issues and Cost**

HRTPO Staff Comment: Why wasn't some of this discussion not mentioned in the Richmond/Hampton Roads Tier I DEIS? If it impacts the SEHSR, it definitely would impact the Richmond/Hampton Roads project, per various citations in the Richmond/Hampton Roads Passenger Rail Project Tier I DEIS.

#### **2-49 (Section 2.2.4.2): “The potential Washington Street location is on the west side of Petersburg, VA, near the intersection of the CSX A-line, S-line, and the NS N-line. There is no current railroad station at this location.”**

HRTPO Staff Comment: Any mention of the Petersburg multimodal center planned near this location? Discussion later talks about the Raleigh multimodal center being planned. Petersburg multi-modal transit center is mentioned later in the document, but this is a consistency issue within this part of the document.

#### **2-56 (Section 2.4): “The SEHSR Greenway Concept has potential to be an important feature of the state-wide trail networks that are being developed by the states of Virginia and North Carolina in conjunction with local governments.”**

HRTPO Staff Comment: Is there a Hampton Roads spur to the Greenway concept?

## HRTPO STAFF COMMENTS

Comments are cited by Chapter-Page (Section [Chapter.Section.Subsection.Secondary Subsection]) (i.e. 3-4 (Section 3.1.4.1))

### SECTION: CHAPTER 3

#### **3-6 (Section 3.1.1.1.2) Chowan River Basin**

HRTPO Staff Comment: The City of Norfolk's public water supply system withdraws water from the Blackwater and Nottoway Rivers. The intakes are outside of the study area but they are located downstream of the project. Such considerations should be reflected in the document.

**3-64 (Section 3.11.1.1):** *"The local study area with the highest proportion of minority residents is Petersburg, VA, where slightly more than 82% of the population is non-white or mixed race."*

HRTPO Staff Comment: Define the various study areas, if not already done, to have the spatial area defined.

#### **3-165 (Rail)**

HRTPO Staff Comment: Any mention of the Strategic Rail Corridor Network designations along the corridor? Impacts to STRACNET in the associated impact section (4.14)?

**3-174 (Safety & Security):** *" From Norlina, NC, where the CSX S-line becomes an active freight railroad to the Boylan Wye in Raleigh (including the active NS-line in downtown Raleigh) common safety measures are in place at all active grade crossings."*

HRTPO Staff Comment: Please explain whether or not the "safety measures remaining in place" are adequate, and, if not adequate, how the DEIS treats them (i.e. is the cost of making them adequate included in the cost of each alternative at each section?).

## HRTPO STAFF COMMENTS

Comments are cited by Chapter-Page (Section [Chapter.Section.Subsection.Secondary Subsection]) (i.e. 3-4 (Section 3.1.4.1))

### SECTION: CHAPTER 4

#### **4-115 (Section 4.11.4.3): Compatibility with Future Land Use and Long-Range Transportation Plans.**

HRTPO Staff Comment: This section is not consistent with Section 3.11.4, where there is a discussion of local plans. Section 4.11.4.3 makes mention of the various local plans in support of the SEHSR, yet 3.11.4 states that these localities rarely mention SEHSR. This is inconsistent information.

#### **4-117 (Section 4.11.4.4): “In addition, city, county, PDC, MPO, and RPO transportation plans within the project study area all address the issues of highway planning, with most regional plans addressing high speed rail.”**

HRTPO Staff Comment: This statement is contradictory to sections 3.11.3 and 3.11.4. The aforementioned sections mention how SEHSR is rarely mentioned in the various planning levels along the corridor, yet this section states most if not all localities have mentioned SEHSR and are compatible with regional plans. Denote a definition as to what constitutes a compatible planning document for the SEHSR.

#### **4-124 (Section 4.11.5.2 Community-Level Impacts): “In Alberta and La Crosse, VA, and Norlina, NC, low-income populations will equally share with wealthier populations the potentially disruptive and intrusive effects of a newly active rail within their community. This includes access restrictions to and from either side of the rail, and exposure to noise and visual intrusions.”**

HRTPO Staff Comment: This statement does not account for greater opportunities that persons with higher incomes may have in relation to relocation possibilities. Persons with higher income/education generally have access to more opportunities and can relocate easier than someone with less income/education.

#### **4-125 (Section 4.11.5.2.1 Richmond, VA): “The VA1, VA2, and VA3 project alternatives all share a common alignment on the active rail line in Richmond, VA. Richmond currently has a large minority population and the highest concentration of low-income population in the study area. With the rail service to be provided in Richmond and the availability of bus transit in the City that will be focused on a transfer center at Main Street Station, this population has a high likelihood of being able to take advantage of the high speed rail service in the corridor.”**

HRTPO Staff Comment: This is a big assumption, and is dependent on employment opportunities (JOBS); jobs during “office hours (9 a.m. – 5 p.m.) vs. second- and third-shift jobs; connectivity to other modes; and the cost to travel on the proposed rail line, among other factors.

**4-125 (Section 4.11.5.2.1 Richmond, VA):** *“Along Ruffin Road, one of the residential units at the Lafayette Gardens apartment community and several adjacent homes may be displaced as a result of ROW acquisition for the railroad bridge construction at this intersection. These displaces are likely low-income and minority.”*

HRTPO Staff Comment: Consider examining the effects on “community cohesion” attributable to the proposed displacements in this and all low-income areas along the corridor. Interdependence among neighbors is generally greater in low-income communities, where families and neighbors often rely on each other for day care, rides to work, rides to the grocery store, hospital, church and other activity centers.

**4-168 (Tables 4-40 and 4-41)**

HRTPO Staff Comment: Consider showing delay in seconds after each LOS for all approaches. This value will provide greater detail, particularly for approaches with severe congestion (LOS F). This comment applies to ALL remaining tables in this section.

**4-189 (Figure 4.10)**

HRTPO Staff Comment: Figure 4-10 should indicate Richmond – Hampton Roads rail lines (from Newport News and Norfolk)

**4-199 (Safety and Security)**

HRTPO Staff Comment: No mention of STRACNET and its impacts along the corridor in this section of the document.

**4-202 (Section 4.17.3):** *“As reported in the SEHSR Tier I EIS, implementation of any SEHSR project alternative is not expected to substantially alter development patterns in the project study area except in the vicinity of the rail stations in Richmond (Main Street Station) and the yet-to-be determined locations of Petersburg, VA, La Crosse, VA, Henderson, NC, and Raleigh, NC.”*

HRTPO Staff Comment: This is an assumption that needs to be supported. There is the distinct possibility of the rural communities developing that do not have station options now, but would vie for one in the future, marketing for satellite living from one of the metro areas.

**4-204(Section 4.17.4.1): Richmond/Hampton Roads Passenger Rail Project**

HRTPO Staff Comment: This section should reflect the reality of the February 2010 CTB approved 'preferred alternative', calling for enhanced intercity passenger rail service on the CSX route, and higher-Speed rail on the Norfolk Southern route. Furthermore, the CTB approved \$93 million in funding for reintroducing conventional passenger rail service from Richmond to Norfolk via Petersburg in June 2010.

**4-205(Section 4.17.4.4): “The CSX’s National Gateway Project is a multi-state project extending from North Carolina to Ohio and includes a spur that connects to the Ports of Hampton Roads.”**

HRTPO Staff Comment: The Ports of Hampton Roads should be noted as the Port of Virginia.

## **HRTPO STAFF COMMENTS**

Comments are cited by Chapter-Page (Section [Chapter.Section.Subsection.Secondary Subsection]) (i.e. 3-4 (Section 3.1.4.1))

### **SECTION: CHAPTER 6**

#### **6-4 (Section 6.3.1) Virginia Local Agencies**

HRTPO Staff Comment: Add Hampton Roads Planning District Commission and Hampton Roads Transportation Planning Organization as Section 6.3.1.17 & Section 6.3.1.18. This is due to our vested interest in the SEHSR project going forward, and its impacts to the design and planning assumptions of the Richmond/Hampton Roads Passenger Rail Project.

#### **6-8 (Section 6.4) Document Distribution Location List**

HRTPO Staff Comment: Add Hampton Roads Transportation Planning Organization to the document distribution list for it is being made available to the public.

Hampton Roads Transportation Planning Organization  
Camelia Ravanbakht, Deputy Executive Director  
723 Woodlake Drive  
Chesapeake, Virginia 23320  
757 420 8300

## **HRTPO STAFF COMMENTS**

Comments are cited by Chapter-Page (Section [Chapter.Section.Subsection.Secondary Subsection]) (i.e. 3-4 (Section 3.1.4.1))

### **SECTION: CHAPTER 7**

#### **HRTPO Staff General Section Comments:**

- MPOs are the federally-mandated transportation policy-making, planning, and programming organizations for metropolitan areas. As such, MPOs should participate in a project like this one as formal cooperating agencies instead of only being allowed to comment during public comment periods.
- In addition, given the potential impact of the SEHSR project on Hampton Roads, especially when the proposed passenger rail improvements to Hampton Roads are taken into consideration, at least one public meeting on the SEHSR DEIS should have been held in the Hampton Roads area. It is strongly recommended that future public meetings on this project include a location in Hampton Roads.

#### **7-5 (Tier II Public Involvement)**

HRTPO Staff Comment: With the high proportion of minorities, as indicated by Table 3-19, the project team should clearly document any information sessions, community events, or meetings with residents of minority communities or with community leaders that represent minority persons. As well, although percentages are not as high, documentation of outreach activities with traditionally underserved communities such as, low-income, elderly and persons with disabilities, would be instrumental to demonstrate reasonable efforts to reach out to these community members.

#### **7-6 (Section 7.2.6) Small Group Informational Meetings**

HRTPO Staff Comment: There does not appear to be documentation of outreach activities to specifically communicate with and/or involve residents within communities with high percentages of minorities, although Table 4-33 documents several of communities having more than 50% minority. If outreach activities specifically aim to involve minority populations, please provide documentation.

## **HRTPO STAFF COMMENTS**

Comments are cited by Chapter-Page (Section [Chapter.Section.Subsection.Secondary Subsection]) (i.e. 3-4 (Section 3.1.4.1))

### **SECTION: CHAPTER 9**

#### **(Section 9.1) Index**

HRTPO Staff Comment: Add an index to some related key words to the Richmond/Hampton Roads Passenger Rail Project and other associated spur projects of the SEHSR. The SEHSR project serves as a main document cited in various other Environmental Impact Statements, and it assists the public and researchers to denote how the SEHSR mentioned these projects within its own Environmental Impact Statement.

#### **9-13: (Acronyms)**

HRTPO Staff Comment: Add “HRTPO Hampton Roads Transportation Planning Organization”

## **HRTPO STAFF COMMENTS**

Comments are cited by Chapter-Page (Section [Chapter.Section.Subsection.Secondary Subsection]) (i.e. 3-4 (Section 3.1.4.1))

### **SECTION: APPENDIX B**

#### HRTPO Staff General Section Comments:

- Although there is extensive documentation of outreach activities to inform and engage the public through various means, there does not appear to be documentation of outreach activities to specifically communicate with and/or involve residents within communities with high percentages of minorities, although Table 4-33 documents several of communities having more than 50% minority. If this did take place, please provide documentation.
- If public involvement included information sessions, community events, or meetings with residents of minority or low-income communities or with community leaders that can represent traditionally underserved communities such as minority, low-income, elderly or persons with disabilities, this should be clearly documented.

#### HRTPO Staff Questions about Public Meetings:

- How were the small-group meetings and additional public meetings advertized?
- How far in advance of the meetings were they advertized?
- What media sources did the project team use?
- Were efforts made to reach traditionally underserved persons?