



Catalyst for Regional Progress

PVPC

Timothy W. Brennan, Executive Director

March 2, 2018

Stephanie Pollack, Secretary and Chief Executive Officer
Massachusetts Department of Transportation
10 Park Plaza, Suite 4160
Boston, Massachusetts 02116

Reference: Comments and Recommendation Regarding the Draft Massachusetts State Rail Plan

Dear Secretary Pollack:

On behalf of the Pioneer Valley Planning Commission (PVPC), which serves the 43 cities and towns and over 630,000 residents of the Pioneer Valley planning district, I am writing to provide you and other applicable MassDOT staff with our agency's over-arching, as well as its detailed, comments and suggestions on the recently-released, draft version of the new *Massachusetts State Rail Plan*. As you may know, our region currently has three major rail projects which we are striving to advance and help implement over a short and longer range time horizon. All three of these regional rail priorities are addressed in MassDOT's draft *State Rail Plan* and, therefore, these projects are the principal focus of our Planning Commission's review comments and suggestions which are as follows.

PART I – GENERAL COMMENTS/SUGGESTIONS

- Expansion of Passenger Rail Service on the Knowledge Corridor:

An expansion of passenger rail service on the Knowledge Corridor north of Springfield in order to better serve the Cities of Holyoke, Northampton and Greenfield is the top short range rail priority of the Pioneer Valley and a project which, in 2015, you and the Baker-Polito Administration agreed to work toward implementing as a multi year, pilot project. We are grateful that this project has been incorporated into the draft *State Rail Plan* and, moreover, that it is classified as a Tier 1 project which confirms MassDOT deems it a priority for implementation. We also see this Tier 1 designation as a reaffirmation of MassDOT's commitment to work with Amtrak and other partners such that the initial pilot phase of this rail service expansion project can be launched, ideally by later this calendar year.

- Upgrade of the New England Central Freight Corridor to the 286K Weight Standard:

We fully support MassDOT's past and current efforts to pursue a major upgrade to the Massachusetts' segment of the New England Central Rail Freight Corridor to achieve the modern, 286,000 pound industry weight standard. Lack of this weight bearing capacity must be addressed in order to overcome a significant challenge to Massachusetts and other rail shippers which rely on this rail freight corridor to move goods along an interstate route which extends from St. Albans, Vermont southward to New London, Connecticut. We know that MassDOT has, to its credit, worked to secure federal funds which would be combined with resources of the state and the private railroad to make the improvements required to achieve the 286K standard along the Massachusetts route segment and trust that these efforts will ultimately prove successful. We are convinced this proposed rail freight upgrade is one of considerable merit and, likewise, understand it is of special importance to shipping and distribution firms that are clustered in the Palmer, Massachusetts area. On a related matter, we also want to acknowledge and lend our support to the Ware River Secondary Projects which are intended to secure access to a 1.2 mile route segment that connects the MassDOT owned Ware River Secondary to the CSX Main Line. We agree this project could greatly enhance rail freight access between this

MassDOT owned line and the CSX Main Line and agree that its Tier 1 designation in the draft version of the *State Rail Plan* makes it a worthy candidate for this high priority designation.

- Interstate East-West Passenger Rail Link (Boston-Springfield-Hartford-New Haven) Using the Inland Route Corridor:

Although our agency, and many others, has steadfastly advocated that MassDOT advance the interstate, east-west passenger rail link and passenger rail services that were recommended in the MassDOT-sponsored Northern New England Intercity Rail Initiative (NNEIRI) final report issued in 2016, these recommendations are, unfortunately, largely ignored and discarded in favor of a new, Tier 2 “Western Massachusetts to Boston Rail Service Study”. This is a major disappointment and setback for our region and the broader interstate service area knowing that the recommendations outlined in the final NNEIRI report called for a \$309 million capital investment to fully upgrade the existing Inland Route rail segment between Worcester and Springfield and, then, with this modern renovated east-west rail corridor in place, utilize it to operate conventional speed trains to provide eight round trips per day linking Boston-Worcester-Palmer-Springfield and Hartford. Accordingly, we must again respectfully request that MassDOT reconsider its decision to cast the NNEIRI recommendations aside and, alternatively, opt to move the NNEIRI recommendations forward into the initial stages of design, permitting and implementation comparable to how the Commonwealth has chosen to address the South Coast Rail Project. Simultaneously, we’d request and recommend that a feasibility study of a much longer range, high speed rail alternative be undertaken consistent with the high speed rail option study that State Senator Eric Lesser has long advocated knowing that to implement a high speed rail link will require a separate, dedicated right of way for high speed trains to safely maintain speeds in excess of 160 mph. We remain convinced the final NNEIRI recommendations are sound, cost effective, achievable within 10 to 15 years and that this investment would generate substantial and long lasting economic benefits for our region as well as the more expansive interstate Knowledge Corridor area that boasts a population in excess of 2.7 million. Correspondingly, implementing the NNEIRI recommendations over the next decade would positively contribute to the concerted and ongoing efforts of the Commonwealth to successfully achieve its ambitious 80% greenhouse gas emissions reduction target by 2050 while, in concert, providing an alternative rail travel corridor to Amtrak’s Northeast Corridor shoreline route which, in New England, has become increasingly vulnerable to repeated flooding incidents that are linked to changing climatic conditions. If, regrettably, MassDOT chooses not to reconsider its decision to reject the east-west NNEIRI recommendations using the Inland Route, we strongly urge a dual-pronged, carefully scoped and expedited study process that would be capable of analyzing both the conventional and the high speed east-west passenger rail options and complete this study work within a year.

PART II – DETAILED COMMENTS/SUGGESTIONS

Working from the beginning of the draft *State Rail Plan* document, the following are a series of detailed comments, edits and suggestions for your consideration in preparing the final version of the *Massachusetts State Rail Plan*.

- 1) On page 7, when discussing Springfield’s Union Station, we’d suggest the text be expanded to underscore that Peter Pan’s intercity bus services are now based at Union Station to depict a more complete integration of modal options now available at this facility.
- 2) On page 7, we believe the CSX double-stack initiative is actually providing the biggest economic development benefits to Worcester and the surrounding Central Massachusetts area rather than “particularly Western Massachusetts”. Modified wording, therefore, seems advisable.
- 3) On page 9, it is our understanding that MassDOT is currently actively working with Amtrak and other partners to expand passenger rail service on the Knowledge Corridor north of Springfield as opposed “to assessing the feasibility of a pilot”. Correspondingly, we’d suggest the language make it clear that

this pilot service, once launched, would represent an extension of select New Haven-Springfield Amtrak trains.

- 4) On page 14, we believe the text relating to a potential rail stop in the Town of Palmer is not accurate given that the NNEIRI final report did not conclude that “existing and future conditions do not warrant further action at this time”. Rather, the final version of the NNEIRI Service Development Plan identifies all the locations on the Inland Route where trains running between Boston and New Haven would stop and Palmer is clearly among them. Accordingly, we cannot agree that a Tier 3 designation is an acceptable classification for a Palmer rail stop in the final version of the *State Rail Plan*.
- 5) On page 29, we’d urge that the description of the NNEIRI study be expanded to identify and describe its recommended alternatives along with the associated levels of service called for on both the Inland Route and Montreal service components.
- 6) On pages 39-40, and once again on page 100, it would be helpful if the wording could also point out the lack of 286K weight capacity south of Springfield which stems from a rail bridge between Suffield and Enfield, Connecticut that does not meet the 286K standard and, therefore, it is an upgrade that Connecticut DOT will ultimately need to address.
- 7) On page 85, the wording focusing on the NNEIRI Alternative needs to be corrected to indicate that the June 2016 final NNEIRI report, and its associated Service Development Plan, recommended running eight daily round trips between Boston and New Haven not four.
- 8) On page 86, the “West of Worcester Ownership and Capacity” section is flawed as it does not acknowledge the work the consultant team performed, as an integral part of the NNEIRI study, to evaluate the implications of increased passenger rail service on CSX freight trains also travelling on the Inland Route between Worcester and Springfield. We strongly urge this section of the text be reviewed and overhauled in order to correct the misleading statement that “NNEIRI study acknowledged but did not address these constraining circumstances specifically.” For reference, please see page iii of the Inland Route Service Development Plan, as well as Appendix E – Operations Modeling, which presents this detailed analysis which documents the evaluation of freight and passenger rail options on the Inland Route using the RTC model.
- 9) On page 87, we’d request the wording of the Plan be modified since the bulk of the north-south Knowledge Corridor is not “fairly rural” but encompasses our region’s economic and demographic centers and their traditional downtown areas and a key reason why ridership levels have remained strong. There are upper portions of the Knowledge Corridor in Franklin County that are more rural but this is not the Knowledge Corridor’s dominant character.
- 10) On page 101, we’d request changes to the map of Tier 1 and 2 projects such that the pilot stage of the proposed expansion of Knowledge Corridor passenger rail service from Springfield to Greenfield is identified as a near term priority. In addition, consistent with feedback from our agency, Town of Palmer officials and citizens, we urge, at a minimum, that the Palmer rail stop and location be re-classified as a Tier 2 project priority in the final version of the *Massachusetts State Rail Plan*.

We trust MassDOT will carefully consider, evaluate and address the comments and suggestions we’ve outlined as it proceeds to the task of assembling and issuing the final version of its new *Massachusetts State Rail Plan*. We thank you in advance for the opportunity to offer our comments and suggestions on the Plan and we stand

ready to support and assist with the implementation of the array of important rail passenger and rail freight projects that will improve and strengthen the Pioneer Valley region its livability and its economic prospects.

Sincerely,

A handwritten signature in black ink, reading "Timothy Brennan". The signature is written in a cursive style with a large, prominent initial "T" and "B".

Timothy Brennan
Executive Director

cc: J. Slesinger, MassDOT
Western Massachusetts Legislative Delegation