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March 2, 2018

Massachusetts Department of Transportation
10 Park Plaza, Suite 4150
Boston, MA 02116

Re: Massachusetts Sierra Club Comments on the Draft 2018 State Rail Plan

Dear Secretary Pollack:

The Massachusetts Sierra Club is promoting a vision of a connected Commonwealth where all parts of the state from the Berkshires to the Cape have access to frequent passenger rail comparable to travel by vehicle, especially private automobiles. Rail is a mode that people want either as a choice or because they must rely on public transportation because of age, health or other reasons. For vulnerable populations, public transportation is a right. Rail also supports tourism. We firmly believe that rail, with its dedicated right of way, can provide a safer and higher level of service—and at a lower financial and environmental cost to the state compared to increasing highway capacity. Finally, rail provides resilience when roads are impassable due to weather or construction, or if private automobiles become less economical due to rising fuel costs (as discussed in section 2.2.4). These benefits argue for significantly increased investment in rail.

I. PROJECT SCOPE

The scope of the 2018 Plan is incomplete in two important ways:

- 1) *Environment*: The plan needs to be guided by clear and measurable environmental goals. Health and environmental benefits of rail by reducing existing or future vehicle trips are only mentioned in general (section 2.1.5). These benefits include reduction in combustion by-products (from particulate matter to greenhouse gases), and reducing operating noise with electric propulsion. The Plan should reference other state plans such as the Green House Gas (GHG) Plan or compliance with National Ambient Air Quality Standards. (GHG is mentioned only in passing for freight on page 63.)
- 2) *Commuter Rail*: The omission of the MBTA system severely limits the usefulness of the plan. The previous 2010 Mass. Rail Plan included this in its scope, and those of the neighboring states of NY and Conn. currently do so as well. The state needs to take an integrated approach to passenger rail. Our comments here address **all** rail. The distinction between commuter rail, regional rail and intercity service is not useful, especially when our highways are so congested. We need to focus on increasing mobility for all citizens, not just peak service for commuters. Transference of existing MassDOT assets to the MBTA may have the effect of maintaining too much focus on commuters. Finally, given that the current rail plan received a 3-year extension, Focus40 is not yet available, and MBTA Commuter Rail Vision is two years away, we ask that these comments receive immediate consideration for the Rail Plan.



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II. EXISTING INFRASTRUCTURE

The plan needs more emphasis on improving existing infrastructure and service.

- 1) *Electrification*: Massachusetts is the only state along the Northeast Corridor without an agency offering electric commuter rail. Unlike Europe and prosperous Asian countries, the United States has little electrified intercity service. The Harrisburg line is the only electrified Amtrak branch off the Northeast Corridor (NEC). Springfield has long been identified as an opportunity for electric service, and should be a goal within the timespan of the plan. The benefits of conversion of passenger rail from diesel to electric are especially significant locally along rights of way in urban areas. Electric locomotives require much less frequent maintenance.
- 2) *Reducing trip times* for passenger or freight rail. This needs to be done in a combination of track and signaling improvements (including double and triple tracking), and for passenger rail, with electrification (including electric multiple units - EMUs). Adding tracks also increases resilience and reliability, as well as enabling more frequent service. Electric service also modestly reduces trip times.
- 3) *Public right of way*: We suggest that investment should generally be prioritized for trackage that is publicly owned, and that the Commonwealth should continue to acquire rights of way to the extent possible. Where are the plans for funding acquisition should ROW become suddenly available? Public control of transportation is the best way to guarantee a permanent, high level of service (the same as with highways).
- 4) *Full service along all existing MBTA rail lines*. This includes seven-day-a-week and late night service.
- 5) *Transit-type services* on our metro Boston rail corridors (such as the Fairmount line). This could likely include EMUs. However, we cannot allow commuter services such as Foxboro to interfere with urban service. (In fact, Foxboro may be better served by a shuttle to the main line from Foxboro to Walpole or even from Mansfield to Walpole and ultimately Framingham - see below.)
- 6) *Rail congestion* is acknowledged in section 2.2.5, but there is no plan to address it. Addressing congestion needs to include Braintree (the single-track section); and Newton (including the single-platform segment of the Worcester Line) as well.
- 7) *Resilience* also needs a plan. For example, the Fairmount line was used in place of the main line between South Station and Readville during the construction of the Southwest Corridor in the 1980s, when the NEC was electrified in 1999, and occasionally as a detour when this section of the main line was blocked. The Fairmount line should be electrified to provide redundancy should the downtown segment become unavailable (as well as providing environmental health benefits to that community. Resilience also means making sure we have more spare equipment so that trips are not cancelled due to breakdowns.



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- 8) *Safety and Access*: Rail travel is safe, but it needs to be safer, both to address Federal requirements, and to increase confidence for the travelling public. Reducing grade crossings will improve both safety and trip times. Positive Train Control (PTC) outside of non-MBTA trackage needs to be addressed. The status of PTC across the state needs to be quantified in the plan. We need to accelerate making our stations universally accessible. The Worcester and Wachusett lines have long segments with no ADA-compliant station. Pittsfield Amtrak station is also not fully accessible.

III. PROPOSED PROJECTS

We have the following comments on the projects listed in the plan:

- 1) *Berkshire Flyer*: Amtrak Thruway Bus or Housatonic Service should be considered if the proposed Flyer is not feasible. Service to Pittsfield is an equity issue.
- 2) *Connecticut Valley*: We strongly support the top two Tier 1 passenger projects.
- 3) *South Station Expansion*: The Sierra Club has been on record for many years opposing this project. We want all these funds to be invested in the only optimal long-range solution, which is the North-South Rail Link (NSRL). NSRL should be Tier 1 project. We think the focus of the study under development should be to determine the best schedule to accomplish the Rail Link more than on its general feasibility. NSRL should be part of the section "Passenger Rail Capacity Programs". We do support the *Tower 1* improvements that do *not* require purchase of the postal facility as a Tier 1 project.
- 4) *South Coast*: As we indicated in our official comments on this project, we support restoration of the Middleborough Secondary (see Attleboro Secondary below), but do *not* support standalone South Coast service via Middleborough. The plan needs to also enable and include daily Cape service at least to Buzzards Bay. The many benefits of this combined regional approach include maintaining a high level of service to Middleborough/Lakeville station. (We support investments for the Cape Line such as those outlined in the CIP plus additional funds for daily passenger service - see below.)
- 5) *Western Massachusetts to Boston Passenger Rail Service*: We think this should be Tier 1. We must connect Boston and Springfield by rail in order to create a robust state passenger rail network. This ultimately could provide a second spine for the NEC. *Palmer Station* should be a part of this.
- 6) *Housatonic Service*: This could move up in tiers with a Conn. partnership. In any case, MassDOT should make track improvements to benefit freight starting with the Berkshire Line Capital Program outlined in Table A-4. However, the plan does not indicate the resulting FRA Class for this line, which we hope will be Class II like the Barre branch and better support passenger service in the future.



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IV. ADDITIONAL PROJECTS

The plan does not adequately address the number of potential projects in existing and new service areas, especially given the 20-year time horizon. The long-term plan should not be driven by present-day financial limitations, and in fact should be the other way around, especially as we need to meet GHG objectives. Here is a list of projects that should be included in the Tiers in priority order:

Project Title	Line	Region	Benefits	Feasibility	Notes	Cost
Cape Commuter Rail	Middleborough/Lakeville	Cape Cod	High	High	Should cross the canal. Falmouth is the closest and most feasible station. There are freight benefits which extend the Otis project	\$
West Station to Cambridge	Grand Junction	Boston	High	High		\$\$
South Coast & Cape to NEC (Cape Codder)	Attleboro Secondary	Cape & South Coast	Medium	High	This connects and extends the Middleborough secondary and provides improved freight service and new and alternative svc. for S. Coast.	\$
NH	Lowell line & Pan Am	NH	High	Low	Nashua and ultimately to Concord	\$\$
Framingham - Mansfield	Framingham Secondary	Metro So. & West	High	High	Higher benefits than simply Foxboro. Public alternative to private Worcester-Providence	\$\$
Fitchburg-Greenfield	Pan Am	Northern tier	Low	Low	Could initially extend Fitchburg Commuter line. Could extend and leverage Conn. Valley investments	\$\$/ \$\$\$
Electrify Conn. Valley	MassDOT	Western	Medium	Medium	Need Conn. cooperation for full benefits	\$\$\$
Boston-Albany	CSX & MassDOT	Western	Medium	Medium	Extends W. Mass. svc.	\$\$\$\$
Salem-Danvers line		North Shore	Medium	Medium	Could be multiple unit shuttle	\$



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Project Title	Line	Region	Benefits	Feasibility	Notes	Cost
Extend Haverhill line	Pan Am	NH	Medium	Low	Plaistow could be phase 1	\$

Thank you for the opportunity to comment. Please let us know if we can provide further information.

Respectfully,

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