

March 2, 2018

Massachusetts Department of Transportation  
Attn Ms. Jennifer Slesinger  
10 Park Plaza – STE 4150  
Boston, MA 02116

Email | [Planning@dot.state.ma.us](mailto:Planning@dot.state.ma.us)

Re: Comments on Draft 2018 Massachusetts State Rail Plan

Dear Ms. Slesinger,

Please find attached my comments on the draft version of the 2018 Massachusetts State Rail Plan (State Rail Plan).

As background, I am a resident of Hatfield (Hampshire County) and a co-founder of the rail advocacy group Trains In The Valley. Our group advocates for improved and expanded use of passenger and freight rail services in the Pioneer Valley region of western Massachusetts.

Please feel free to contact me should have you have questions regarding the attached set of comments.

Sincerely,

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Co-founder

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attachment

# Comments on the draft version of the 2018 Massachusetts State Rail Plan

Prepared by  
Ben Heckscher | Co-founder, Trains In The Valley  
March 2, 2018

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## General Comments (in no specific order)

### The Need for Western Massachusetts to Boston Passenger Rail Service

It is time now for MassDOT to move forward with the necessary steps to establish frequent intercity passenger rail service between Boston, Springfield, Hartford and New Haven - along the corridor known as the Inland Route. Such a service would greatly benefit Western Massachusetts, the larger Connecticut River Valley Region and the Commonwealth.

The State Rail Plan suggests that further study of this project is needed. I would instead argue that further action is needed rather than further study.

The 2016 Northern New England Intercity Rail Initiative (the NNEIRI Study) — a three-year effort that generated over 1,300 pages of study material — recommended the establishment of this passenger rail service.

The study concluded that the service should be operated with passenger trains operating at a maximum speed of 79 miles per hour. The establishment of true high-speed passenger rail service (at speeds at or above 125 mph) — which has been advocated by some — was not supported by the NNEIRI Study for many reasons.

It is highly likely that the perceived challenges with this proposed passenger rail service can and will be resolved in the *decade* that it will likely take the Massachusetts Department of Transportation (MassDOT) to fund, design, permit, and construct such a new service.

MassDOT should take a lead from states in the western part of the country and think in bold ways now to make a necessary transformative project like this move ahead as quickly as possible.

## **Palmer Station**

The NNEIR Study recommends the establishment of a passenger rail station in Palmer as part of the Preferred Alternative. This conclusion should be carried forward into any new Western Massachusetts to Boston Passenger Service Study.

As stated in the State Rail Plan, there is no justification to support the establishment a station in Palmer that provides a stop for just the existing Amtrak *Lake Shore Limited* service.

Considering the above two statements, I suggest that the Project Title listed as “Palmer Station” (under Tier 3 No Action Recommended at the Time) be changed to “Palmer Station for *Lake Shore Limited* Service.”

Making this change would make it clear that the State Rail Plan is not ruling out a possible future station in Palmer.

## **Springfield to Greenfield Passenger Rail Service**

I strongly endorse this service and very pleased to find it listed as a Tier 1 Project (Priority for Implementation) in the State Rail Plan.

It is very important that the proposed new passenger rail service between Greenfield and Springfield be an extension of the existing Amtrak (or future CTrail Hartford Line) service between New Haven and Springfield. Users of this service expect to travel up and down the valley without the need to change trains in Springfield as has been suggested as a possible service option in the past.

It is also important that the pilot service period be of sufficient length (3 years would be optimal) to allow people in the Pioneer Valley — some of whom were not brought up using passenger rail service — to adapt their travel patterns in the region.

## **Transparency of the State Rail Plan Process**

More should be done to improve the transparency of this process and similar study processes within MassDOT.

As example,

1. A meeting summary of the State Rail Plan meeting on June 14, 2016 was published on the project website [<https://www.mass.gov/lists/rail-plan-documents>]. The summary of the meetings held on November 9 and 21, 2016, January 29 and February 2, 2108 should be published on the project website.
2. A summary of the comments received (related to the plan) should be published on the project website.
3. A PDF “Compare File” (comparing the draft plan with the final plan) should be posted on the project website so that everyone can easily see what was changed during the final review process.
4. MassDOT should use Eventbrite (or a similar platform) to organize public information meetings. Eventbrite is a very effective tool for managing events such as public meetings.
5. MassDOT should consider holding public information meetings on-line using the same facilities that are currently used to make the MBTA FMCB and MassDOT Board Meetings accessible to the public via the Internet. Doing so would increase public’s participation and the overall transparency of this process.

## **Delayed Production of the State Rail Plan**

The State Rail Plan was delayed for reasons that are unclear. The reasons for this delay should be clearly explained in the plan.

The previous Massachusetts State Rail Plan was published in September 2010. The Passenger Rail Investment and Improvement Act of 2008 (PRIIA) requires that States revise and resubmit to US DOT a State-approved plan no less frequently than once every 5 years. Over seven years have now past since the 2010 State Rail Plan was finalized.

Bids for the update to the Massachusetts State Rail Plan Request-for-Response were opened on April 22, 2015 but the draft rail plan was not released until January 26, 2018 – almost three years later.

## **Layout of the State Rail Plan**

The layout of the State Rail Plan should be simplified so that it is easier to read. The current layout, with a mixture of wide and/or narrow columns of text, can be confusing and difficult to follow.

## **Extension of the Public Comment Period**

Thank you very much for extending the public comment by two weeks, to March 2, 2018.

As a matter of policy, it should be that the public is always permitted to comment for a period of 30-days whenever there is an update to a major statewide plan.

## Specific Comments

### Page 5

#### Pie charts at the bottom of the page

1. The layout of the lower half of this page is confusing. The layout could suggest that the commodities listed in the first two columns are moved by truck (since they are under the truck pie chart) — and that rail is only used to move gravel and non-mineral commodities

### Page 23

#### Grade Crossing Safety Projects

1. In this sentence, “the remaining 41 improvements were located on the following rail roads: Chessie-Seaboard Transportation (CSXT), Grafton & Upton, New England Central, Pan Am Railway, Pan Am Southern, and Providence & Worcester owned railroad.”

The words “rail road” should be replaced with “railroad” and the name “Chessie-Seaboard Transportation (CSXT)” should be changed to simply “CSX.”

### Page 24

#### Tourist Service

1. This sentence should be removed since it is not correct — “Year-round weekend service over the route is provided from Boston to Hyannis.”

### Page 25

#### CSX Double Stack Initiative and Intermodal Investment

1. The sentence does not totally make sense – “CSX currently has 170 employees and 319,000 carloads available to support freight rail service in the State.”

Better wording might be, “CSX currently has 170 employees and handles more than 319,000 carloads of freight its rail network in the State.”

Reference:

<https://www.csx.com/index.cfm/about-us/state-information/massachusetts/>

**Page 29**

**1.7.3 Involvement in Multi-State Rail Implementation**

1. "January of 2018" should be replaced with "May of 2018" (the planned date for the start of CTrail Hartford Line service.)
2. The term "Massachusetts Springfield Union Station" should be changed to simply "Springfield Union Station."

**Page 29**

**NEC Future**

1. The term "SGR" should be defined here and in a few other areas within the document since this is not a common term for most readers.

**Page 38**

**New England Central Railroad (NECR)**

1. The term "GW" should be defined here.

**Page 41**

**Regional Connections**

1. This sentence does not appear to be correct, "according to Freight Analysis Framework (FAF) 3.6, 2013 Provisional Data, for the Commonwealth, 8.4 percent of total rail tons are inbound, 3.8 percent are outbound, and 96.8 percent are transported within the State. Additional data related to freight rail volumes is included in Section 2.2."

Specifically, I suspect that you meant to write "through" (the state) rather than "within" (the state). It would seem unlikely that 96.8 percent of total rail tons are transported within the state.

It is also odd that the percentages (8.4, 3.8 and 96.8) add up to more than 100 percent.

## Page 46

### Intercity Rail Service

1. I would recommend that the words “Long distance” be removed from the term “Long distance intercity passenger rail service.”

Amtrak operates three service segments - Northeast Corridor Service, State Supported Service, and Long Distance Service. To use the term “Long distance” here could be confusing for some readers.

## Page 46

### Table 2-3: Amtrak Intercity Rail Network Summary

1. More current ridership data (for FFY2017) is available on this link <https://www.narprail.org/all-aboard/tools-info/ridership-statistics/>

## Page 55

### Positive Train Control: Passenger and Shared Freight Operations

1. The State Rail Plan should include a more detailed accounting of plans for providing Positive Train Control (PTC) within the Commonwealth — in particular, which lines will have PTC and when. e.g., the Amtrak line south of Springfield, and portions of the CSX rail network in state.
2. The State Rail Plan should endorse the implementation of PTC on Amtrak passenger rail routes that operate outside of the MBTA service area.

The implementation of PTC has been recommended by the National Transportation Safety Board for a very long time and there is no reason that some rail passengers in the Commonwealth should be put at more risk than others.

Specifically, the State Rail Plan should indicate that PTC will be implemented on the MassDOT-owned Connecticut River Main Line (between Springfield and East Northfield). This line is currently used by Amtrak Vermonter service and it is proposed that this line will be used by expanded Greenfield-Springfield passenger rail service.

**Page 86**

**Boston to Western Massachusetts Passenger Service**

1. The term “a short section” does not need to be in quotes. It would be sufficient to simply say “short segment” (without the quotes).

**Page 86**

**West of Worcester Ownership and Capacity**

1. This section does not fully explain the full story.

Most of what is said here was studied and addressed by the NNEIRI Study, which recommended that segments of the former second track (between Palmer and Worcester, as example) be reinstalled to allow for the operation of expanded passenger rail service along with CSX’s rail corridor. This should be pointed out.

**Page 86**

**South Station Capacity**

1. This section is a bit misleading

This issue in the short term could be overcome right now simply by using the peak hour “slot” between Worcester and Boston that is today used for the MBTA limited stop service between these two cities, i.e. if there was a morning Springfield to Boston train it would simply replace the existing Worcester-Boston limited stop service that operates in the peak hour today.

Also, any expanded passenger rail service between Springfield and Boston is years away so to list this as a constraining issue, when the State Rail Plan clearly states that solving the South Station capacity issue is a Tier 1 Priority, is misleading.

## **Page 86**

### **Worcester to Boston Capacity**

1. This section has been written to preclude any other ideas besides spending significant sums of money to upgrade the MBTA rail corridor between Worcester and Boston.

In all likelihood, Springfield-Boston service would involve only 1 or 2 peak hour trains (in each direction) between Springfield and Boston to start. One of these trains could take the existing slot used by the existing limited stop train between Worcester and Boston and the other train could take the slot of an existing MBTA run and make a few other limited stops.

It is hard to imagine that MassDOT and the MBTA could not provide 1-2 peak hour slots between Worcester and Boston for passenger trains coming from points further west.

## **Page 103**

1. It would be useful, for the reader, if you could loosely define the notations \$, \$\$, \$\$\$, and \$\$\$\$ in this (and similar charts in the State Rail Plan) by indicating the approximate magnitude of cost for each set of dollars signs.

**Page 105**

**Tier 1 Priorities**

**Long-term Investment Program**

**New Haven to Springfield Passenger Rail Service**

1. This section says almost nothing about the Tier 1 project to expand passenger rail service between New Haven and Springfield. This oversight should be corrected.
2. MassDOT should more actively participate in this project in a meaningful and substantial way by investing in the Massachusetts portion of this rail corridor.

In particular, the State Rail Plan should broadly outline

- (a) State-of-Good-Repair upgrades to the rail line between the CT-MA border and Springfield;
- (b) Safety improvements to the limited number of highway grade crossing on the Massachusetts portion of this line - in particular, the crossing in Springfield (in Riverfront Park) that is protected by nothing more than crossbucks and a stop signs;
- (c) Creation of a proper layover yard for storing CTRail and Amtrak equipment in Springfield.

**Page 108**

**New Bedford Marine Commerce Terminal Rail Spur**

The term “NBMCTRS” should be defined since it is not totally clear what this term means.