



Transportation for Massachusetts

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March 2, 2018

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

Re: Comments on the Draft Massachusetts State Rail Plan

Dear Secretary Pollack:

On behalf of Transportation for Massachusetts, a statewide coalition representing over 70 member and partner organizations throughout the commonwealth advocating for modernized, safe, reliable and equitable transportation choices for all residents, thank you for considering these comments on the draft State Rail Plan.

We greatly appreciate the work that has gone into this draft, and offer these comments in the spirit of improving the plan.

High Level issues

Vision: the long-term vision for the state rail plan is constrained by a focus on managing existing assets and investments. These are worthy goals, but should not define the limits of MassDOT's ambition. A statement on how rail investments and service can contribute to the future of the Commonwealth is important.

Access to housing and workforce: there is no stated goal to utilize rail to address the lack of connectivity between regions to address the imbalance of housing affordability, employment opportunities and anticipated population growth in the coming years. The rail plan is a rare opportunity to at the least acknowledge these state and regional priorities. For example, there are economically disadvantaged regions, such as the Berkshires and the Northern Tier which would significantly benefit by investment in passenger rail.

Climate change: the rail plan should elevate the use of rail as part of a coordinated strategy to reduce the effects of climate change, for which transportation is now the leading contributor. MassDOT should not miss the opportunity to acknowledge that the Administration's goals to reduce GHG emissions can be served by greater investment in rail transit, and the benefits of electrification of the fleet.

Funding: the plan justifiably focuses its near term goals on known funding sources, consistent with the approach taken in the Capital Investment Plan. But a more ambitious,



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20-year horizon provides an opportunity to provide a more expansive vision of rail transit. The plan should acknowledge the demand for increased investment and signal MassDOT's investment priorities and/or a process to identify those priorities, such as through a public process similar to that undertaken through Focus40. Absent a willingness to even entertain the values of additional investment, the Rail Plan risks serving as an argument that we do not need it.

Harmonizing planning efforts: we appreciate the extraordinary efforts underway with Focus40 and the upcoming Commuter Rail Vision process, and the mention of these planning efforts in the draft. The separation of state rail, commuter rail and the MBTA as a whole should be rethought, and the next Rail Plan should incorporate all rail.

Project level comments

SSX/NSRL: the debate between proponents of South Station Expansion project and the North-South Rail Link will only intensify in the years to come. This plan is an opportunity to definitively state why one or both projects are preferable from a planning perspective. While SSX is mentioned, MassDOT and the public would be well served by a clear statement of why this expansion should proceed whether or not NSRL advances beyond the current Feasibility Reassessment.

Freight: we applaud the focus on investments in freight rail, including 286K, because that is significantly preferable to increased roadway freight and the resulting traffic and environmental effects.

Knowledge Corridor Rail: we thank MassDOT for elevating this service, and take note of the comments expressed in a letter submitted by the Pioneer Valley Planning Commission.

East-West Rail: by identifying a "lack of consensus" in the Northern New England Interstate Rail Initiative (NNEIRI), MassDOT fails to account for the work that has been done, including extensive public outreach that was greater than that undertaken for this plan. The State Rail Plan was an opportunity to build on this work, not to set it aside. While the capital investments required are not funded in the current CIP, this is a good example of how the Plan's constrained approach unnecessarily limits the public interest.

South Coast Rail: we thank MassDOT for incorporating SCR into the draft plan. Restoration of passenger service to an underserved region of the state is overdue. It is not clear that the Stoughton Electric preferred option is affordable within existing revenue sources, however. It would be preferable to acknowledge the capacity limitations of the rail network closer to Boston that limit a desirable level of service using the Middleborough Route.



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We thank you for your consideration of these comments, and for the thoughtful work that went into the plan's draft.

Respectfully,

Christopher Dempsey, Director