



Date October 1, 2024

To Office of Transportation Planning
 Attn: Makaela Niles, Project Manager
 Massachusetts Department of Transportation

From Western Mass Rail Coalition

RE **Comments on the Northern Tier Passenger Rail Study Draft Final Report**

Dear Makaela,

With this letter we are submitting the following set of comments on the Northern Tier Passenger Rail Study Draft Final Report, dated August 13, 2024.

Sincerely,

Ben Heckscher

Ben Heckscher
For the Western Mass Rail Coalition
wmassrail.org

Introduction

The proposed restoration of passenger rail service along the Northern Tier Route (also known as the Route 2 Corridor) offers the opportunity for the northern portion of western and central Massachusetts to once again be connected to the Boston Metro region.

Passenger service west of Fitchburg along this route was discontinued during the 1950s during a period when personal vehicles became the predominant means of transportation for almost all long distance intrastate travel in our state.

Since then times have changed. The major roadways in and out of Boston are jammed at many times of the day, housing in the eastern part of the state has become so expensive many people (in particular young people) cannot afford to live there, and rising costs have made it more and more expensive to purchase, operate and service a personal vehicle.

The time is now to restore passenger rail on the Northern Tier Route by initiating the necessary project planning and development work that would be needed to move the project forward.

The restoration of passenger rail service along this corridor would provide a key pillar of support for the many economically disadvantaged communities within this region, which have not prospered economically to nearly the same degree as communities in the eastern part of the state.

Renewed passenger rail service along the Northern Tier Route would provide a means of travel that would lower carbon emissions, be energy efficient, reduce traffic congestion, and offer an economical way for people to move across the state (without driving) over longer distances. This is the future, not the past.

In our view the logical choice from the output of the study is phased introduction of Alternative 4, Full Local Service.

This alternative would provide rail service to a larger number of stations and thus a larger population of people along the corridor. Importantly it would provide a strong basis for renewed economic and housing development in the communities that surround the planned stations.

We have a choice, now that the study is complete. We can place the study on a shelf and do nothing, or we can take the necessary steps to move away from our dependence on personal vehicles and follow the lead that has been set in other regions of the country to provide affordable, dependable, and reliable passenger rail service that supports underserved communities of people who outside of the Metro regions.

Proposed Next Steps

1. Governor Healey and the legislature should designate Fair Share Amendment Funds in the FY2026 State Budget to move this project through the next stage of project planning and development;
2. Governor Healey should articulate the need to restore and expand passenger rail service on the Boston and Albany Corridor (West-East Rail), and the Northern Tier Corridor, with similar effort, focus, funding, and goals;
3. The University of Massachusetts Amherst Center for Economic Development should be engaged to study the economic benefits associated with the restoration of passenger rail service along the Northern Tier Route, between Boston, Greenfield, and North Adams;
4. MassDOT should be directed to engage with the owner and operator of the Pan Am Southern rail corridor to better understand the full scope of the planned improvements to this freight corridor, since improvements to the corridor for freight service will reduce the level of improvements needed for future passenger service;
5. MassDOT should work with the owner and operator of the Pan Am Southern rail corridor to identify improvements along the rail corridor (as example, renewal of railroad-highway crossings and bridge restoration work) that would directly benefit both freight service and any future passenger service that could be accomplished using available federal grants;
6. MassDOT should engage a consultant to better understand the potential ridership that could be generated between restored passenger service on the Northern Tier Corridor and adjacent passenger rail corridors, such as the Valley Flyer and the Vermonter Corridor — in particular for travel between Boston and Vermont/Montreal;
7. MassDOT, working with stakeholders and UMass Amherst, should work to develop a plan to speed up the planning, development, design and construction required for the restoration and/or improvement of passenger rail service along the Northern Tier Corridor and Boston and Albany Corridor, and the corridors that extend to neighboring states;
8. We applaud the study team for considering electrification as an option for the Northern Tier Corridor. While this may not be feasible in the short to medium term we feel that a long term plan needs to be developed to move away from the operation of diesel powered intercity rail trains in the Commonwealth. Alternative means of propulsion — such as overhead electric power sources and/or hydrogen powered passenger train sets, to name just two options, should be studied on routes where it makes sense.

Specific Comments on the Draft Study Document

Page 6, Figure 1.2

Service Characteristics

This table indicates that the “coverage area” for the study is “limited to Massachusetts vs. extending into Vermont and New York.”

This wording appears to indicate that the ridership estimates in the draft report are limited to riders within the catchment areas as defined within the study document, and that the report has not considered the possibility of intercity rail riders who might connect in Greenfield with the proposed Northern Tier Service.

We think it is very important to carefully factor in the potential ridership that could exist with a timed connection between the Vermonter and points east of Greenfield, in particular Boston.

In 2016 the Massachusetts Department of Transportation and the Vermont Agency of Transportation, in coordination with the Connecticut Department of Transportation, completed a three-year feasibility and planning study known as the Northern New England Intercity Rail Initiative (NNEIRI Study).

This study recommended that a new round trip passenger train between Boston and Montreal via Springfield be established. The projected annual ridership between Eastern MA and Vermont/Montreal for this new service is shown in this table:

Eastern MA – Southern VT	34,700
Eastern MA – Northern VT	28,200
Eastern MA – Montreal	113,100
TOTAL	176,000 riders/year

Data source: [Northern New England Intercity Rail Initiative Study Summary](#), 2016, page 10

If you were to conservatively estimate that half (50%) of the ridership that was projected in the NNEIRI Study would be willing to travel between Boston and Vermont/Montreal by making a connection in Greenfield we are left with 88,000 riders/year on this route.

In this case, roughly 44,000 people per year (approx. 120 people per day on average) would be boarding a train in Boston to travel to Greenfield to connect with the northbound Vermonter and another 44,000 people a year (approx. 120 people per day on average) would be stepping off the southbound Vermonter in Greenfield to board a train destined to Boston.

If nothing else we believe that you should explicitly point out that the study did not address the possibility that significant ridership might be generated by people who would use the Northern Tier service to connect to a train traveling to/from Vermont and (in the future) Montreal.

Page 31

Regulatory Baseline section

The paragraph in the middle of the page states that the Springfield Terminal [Railway] Company operates the freight rail service on the Pan Am Southern corridor. This information is out of date and should be updated before the final report is issued.

The Springfield Terminal Railway Company no longer operates the freight rail service on the Pan Am Southern network. This service, as of September 1, 2023, is now operated by the Berkshire & Eastern Railroad.

Pages 38–40

Greenfield | Station Location Access and Area Characteristics

On page 38, under Platform Fit, the text read “The tangent section of track opposite the Olver Transit Center, along Deerfield Street, may have adequate space for a 510-foot long platform.”

On page 40, the text associated with Figure 3.13 reads “Site of Greenfield ITC and a hypothetical 800-foot platform...”

If the site will only support a 510-foot platform, as the wording on page 38 suggests, then a 510-foot platform should be shown and described in Figure 3.13.

/continued on the next page/

Additionally, the platform shown in Figure 3.13 (on page 40) would appear to be on the north side of the siding adjacent to the existing timber platform (as shown in the zoom image below) used by Amtrak's Valley Flyer and the Vermonter service.



The north end of the existing siding adjacent to the existing timber platform provides no access to the rail line that leads to North Adams, so it is not clear at all how a platform at this location could be used for Northern Tier Service, unless the study team is contemplating a backup move in and out the siding that is adjacent to the platform.

With that said, we think additional wording should be added to this section of the document to more fully explain where the proposed station platform would be relative to Olver Transit Center and the existing timber platform.

We also think the diagram should be updated since it is not at all clear at the moment how the siding in the diagram would serve Northern Tier trains to/from stations to the west.

Pages 68 and 83

Both of these pages use the term “Amfleet passenger cars.”

Our understanding is that Amtrak intends to replace all of its Amfleet passenger cars with Siemens Venture passenger cars by 2030.

We would suggest that this wording be updated since it is likely that any future Northern Tier service would not be using Amfleet passenger cars.

Page 79

Alternative 4: Full Local Service

This option proposes that a station stop be established in Gardner, MA.

We would question the need and the ridership numbers listed for a station stop in Gardner because of Gardner’s close proximity to the existing MBTA Commuter Rail Wachusett station stop.

The driving time between the center of Gardner and the MBTA station in Wachusett is 12–14 minutes according to Google Maps. We suspect that most people in the Gardner catchment area will simply continue to drive to the station in Wachusett because of the significant number of frequencies available on the MBTA Commuter Rail between Wachusett and North Station.

General comment

The estimated cost for bridge work seems to be too high

The study team has proposed that \$450 million dollars (nearly half a billion dollars) would be needed for bridge restoration work proper to the establishment of passenger rail service on the Pan Am Southern rail corridor.

A lay person would ask the obvious question here, which is why would it be necessary to spend \$450 million on bridge rehabilitation when the existing bridges safely support freight trains today.

Notably, the bridges along the Knowledge Corridor, many of which are of the same vintage as the bridges on the Northern Tier Corridor, were upgraded to support passenger service at a cost that was a fraction of what the study team says would need to be spent before passenger trains could operate on the Northern Tier Corridor.

More should be said in the report to explain why the cost of the bridge work is so high in the draft report compared to what was spent on bridge restoration work on the Knowledge Corridor project.

General Comment

Appendix A – Public Engagement

Comments provided by individuals members of the working group and members of the public are detailed in the meeting reports, and as part of a section titled “MassDOT Virtual Public Involvement Comment Summary.” We assume that all written comments received were to be included in Appendix A.

On February 23, 2023 the Western Mass Rail Coalition (WMRC) submitted a set of detailed written comments (13 pages) as part of an email that was sent to and acknowledged by the MassDOT Project Manager for this study.

None of the WMRC comments referenced above are noted anywhere in Appendix A. We assume that this was an oversight and that the comments have been seen by the study team.

With this comment we ask that (a) the WMRC comments dated February 23, 2023 be added to Appendix A of the final report, and (b) that MassDOT check to see if there are other comments that were submitted by email or other means (for example, postal letter) and that any other comments be added to Appendix A of the final report so that the record is complete.

General comment

The need for a listing of abbreviations

Please add a listing of abbreviations in the final report after the table of contents.

Such a listing would allow readers to more easily understand the many abbreviations that are used throughout the report and the appendices, such as:

LBS Location-Based Services

MPO Metropolitan Planning Organization

PAS Pan Am Southern

PTC Positive Train Control

RTC Rail Traffic Controller