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Executive Director

March 1, 2018

Ms. Stephanie Pollack  
MassDOT Secretary and CEO  
10 Park Plaza – 4<sup>th</sup> Floor  
Boston, MA 02116

RE: Massachusetts State Rail Plan Comments

Dear Ms. Pollack,

The Berkshire Regional Planning Commission appreciates MassDOT's efforts of updating the *Massachusetts State Rail Plan* which outlines state's priorities and proposed plans for passenger and freight rail investment over the next 20 years. Within Berkshire County, both passenger rail and freight rail are of interest to improve mobility and expand economic opportunities. We are particularly interested in studies to improve the grossly inadequate passenger rail service serving the region and in upgrading the secondary line rail infrastructure to better serve rail freight needs. Improvement to both freight and passenger rail will be beneficial to a variety of businesses, will serve as an impetus to increase business opportunities, and assist in helping to reverse our five decade long loss of younger workers. After reviewing the draft document and attending the public meeting, BRPC has substantial concerns regarding a few aspects of the plan and has several major comments to consider for incorporation in the final version of this important plan. We also endorse and have attached the comments provided by the Berkshire County Selectmen's Association regarding the draft Massachusetts State Rail Plan.

Berkshire Flyer Service

First, the study of Berkshire Flyer Service, at a minimum, should be listed as a Tier 2 project. We actually believe that strong consideration should be given to move it into a project to be implemented within the five year immediate action horizon, depending on the study results

which are imminent. As you are aware, pursuant to the 2017 legislative directive, The Berkshire Flyer Study was undertaken to evaluate the feasibility of initiating seasonal Amtrak passenger rail service between New York Penn Station and Pittsfield, Massachusetts. This study effort, championed by Senator Hinds, has been underway since September with the working group working diligently with support from MassDOT's Rail and Transit Administrator. This study is on schedule for completion by the March 1, 2018 legislative deadline. All indications are that this service is viable and would be beneficial to the Berkshire's travel and tourism industry. We strongly disagree with MassDOT's decision to not include a recommendation for a Berkshire Flyer continuation study as a Tier II project because "current studies (i.e. Berkshire Flyer) cannot be evaluated for long-term utility until that work is complete" (page 84). It is illogical to drop any comment on studies or projects which are actively underway and have a gap of four years before they are mentioned again in a rail plan update. We believe that the State Rail Plan should be used to foster the continuation of study efforts to establish a permanent service to the Berkshires and therefore urge that the Tier II recommendations be amended to include such a study. It is unacceptable to push this study off until the next update of the State Rail Plan in 2023 when we believe that actual establishment of service may well be viable by FY 2020.

#### Western Massachusetts Passenger Rail Service

BRPC applauds the Rail Plan's Tier 2 recommendation of the Western Massachusetts to Boston Passenger Rail Service Study. In one instance, the plan refers to Springfield/Pittsfield to Boston Passenger Rail Service (page 84) being considered as a project for the long-term Rail Plan. In order to avoid any confusion, it is critical that the draft document be modified to reflect that this study effort is intended to include all of western Massachusetts as well as connections further west to Albany, NY. The plan should also be amended to reflect a consistent reference to the proposed study effort. It is our recommendation that this study effort be referred to as the Western Massachusetts (Pittsfield/Springfield) to Boston Passenger Rail Service Study. Given the proximity of the Rensselaer, NY, Amtrak station, with its strong passenger rail service southward to New York City, we believe the study should be a bi-state study in collaboration with New York. We concur with comments made by others in western Massachusetts that the Commonwealth needs to evaluate the needs and opportunities of the broader rail network system and, where appropriate, as in this case, work with adjoining states to strengthen the system, not just the parts that happen to lie within the boundaries of Massachusetts.

#### Freight Rail Service and Housatonic Line

Freight rail service also plays an important role in the region's economy. As indicated on page 17, freight rail on the Housatonic Line directly supports 977 jobs within the region. It is imperative that the rail network throughout Berkshire County be maintained in a good state of repair and the track must be upgraded to 286K rail. The Housatonic Line owned by MassDOT needs substantial improvements to improve safety and reliability of the line, if for no other reason than the rails date to 1920. As importantly, these track improvements will assist with continuing efforts of retaining jobs and possibly increasing employment opportunities in our region.

Constructing these upgrades/improvements will also ready the line for potential future passenger rail service. We support the recommendation made by the Massachusetts Sierra Club's Transportation Committee that MassDOT should make track improvements to the Housatonic Line to benefit freight and these should be done in a manner to ultimately result in an FRA Class II as with the Barre branch to better support passenger service in the future. We also concur with comments made by the Berkshire County Selectmen's Association and do not believe that any further consideration of passenger rail service on the Housatonic Line should be summarily dismissed. We believe continued discussion with Connecticut is needed and should occur within the next two years and thus we believe that further study of utilizing the Housatonic Line should be listed as a Tier 2 project. As with east-west passenger rail, multi-state railroad system needs require a broader evaluation. With capacity constraints on significant increases in passenger rail traffic along the Hudson River corridor, improvements in other existing corridors may be needed for western New England and eastern New York.

#### Northeast States System-wide Planning Needed

As a critical policy matter, the plan should call for aggressive, comprehensive system-wide planning for passenger rail service across the northeast. No single state in New England can deal with its passenger rail "system" without considering the rail assets and issues in adjoining states. In the case of the Berkshires, our system includes assets and issues in at least both New York and Connecticut. Our experience thus far with the Berkshire Flyer project required discussions with New York; those discussions showed some inherent capacity limitations on relying on the Amtrak system serving the Hudson Valley. Alternatives to help overcome those limitations then rely on joint planning with Connecticut and New York. The multi-state planning effort for the passenger rail system should be an explicit policy statement in the plan.

#### Greenhouse Gas and Air Quality Improvements

It is commonly known that the transportation sector is deficient in meeting emission reduction goals set forth in the Global Warming Solution Act, despite its contribution of approximately half of all greenhouse gas emissions in the state. Many of the recommendations contained in the Rail Plan could potentially reduce greenhouse gas (GHG) emissions. However, there is virtually no discussion on the GHG reductions and air quality improvements associated with any of the recommended projects. As the underlying intent of this plan is to justify the selection of projects, it is only logical that this aspect be addressed and included in the plan. In doing so, projects offering greater GHG reductions and environmental benefit can be prioritized.

#### Quantifying Economic Benefits/Impacts

If the stated purpose of the State Rail Plan is to "serve as the basis for federal and state rail investments within Massachusetts," the plan should contain discussion and information on the economic benefits\impacts associated with each of the recommended projects. As it currently stands, this information is not present in the draft document. Consideration should be given to

including this information which can also be utilized to inform MassDOTs annual Capital Investment Plan.

It would be appreciated if MassDOT would compile and post a summary of all comments which were received on the draft plan and how each of the comments was addressed. This will work to strengthen the public participation process and provide greater transparency.

The MassMOVES initiative identified rail transit as the first priority for western Massachusetts as well as for five other areas of the Commonwealth. The draft Rail Plan is the appropriate mechanism to further these priorities which will can increase mobility options and compliment economic development efforts. MassDOTs efforts to prepare the *State Rail Plan* which furthers these priorities is a move closer towards actual passenger rail service. BRPC is committed to working with MassDOT to implement the recommendations of the Massachusetts State Rail Plan including participating in the Western Massachusetts (Pittsfield/Springfield) to Boston Passenger Rail Service Study and continuation of the Berkshire Flyer initiative with a realistic goal to implement service within three years.

Sincerely,

A handwritten signature in black ink, appearing to read "Nathaniel W. Karns", with a long horizontal flourish extending to the right.

Nathaniel W. Karns, AICP  
Executive Director

Attachment: Comments of the Berkshire County Selectmen's Association on the Draft  
Massachusetts State Rail Plan, February 8, 2018

Cc: The Honorable Adam Hinds, State Senator  
The Honorable John Barrett, III, State Representative, 1<sup>st</sup> Berkshire  
The Honorable Paul Mark, State Representative, 2<sup>nd</sup> Berkshire  
The Honorable Tricia Farley-Bouvier, State Representative, 3<sup>rd</sup> Berkshire  
The Honorable Smitty Pignatelli, State Representative, 4<sup>th</sup> Berkshire  
Mr. Michael Case, President, Berkshire County Selectmen's Association  
Mr. Jonathan Butler, President & Chief Executive Officer, 1Berkshire  
Ms. Karen Christensen, The Train Campaign  
Ms. Sandra Carroll, Chief Executive Officer, Berkshire County Board of Realtors

COMMENTS OF THE BERKSHIRE COUNTY SELECTMEN'S ASSOCIATION  
ON THE  
DRAFT MASSACHUSETTS STATE RAIL PLAN

February 8, 2018

**Introduction and Statement of Interests.**

These comments are submitted by the Berkshire County Selectmen's Association (BCSA) on the Draft Massachusetts State Rail Plan (Draft Plan). The BCSA is comprised of representatives of the Boards of Selectmen of the 30 towns in Berkshire County.

Berkshire County has a strong interest in improving the public transportation options, including by rail, to connect this region to the rest of the Commonwealth. This interest is documented in two recent reports on this issue. The first report is the recent MassMoves report, developed by the Massachusetts Senate in collaboration with the Barr Foundation. This report found that the first priority of respondents from Western Massachusetts, including the Berkshires, was to "Establish/improve east/west rail links (connecting Pittsfield, Springfield and Worcester to each other and to Boston and New York State." The second report is the Berkshire County Comprehensive Economic Development Strategy (BRPC, 2017). This Strategy states: "The region would benefit from more frequent passenger rail service that would allow people to commute daily to Albany, NY, Springfield, MA, Worcester, MA, or Boston, MA without the need for an automobile. New York is studying true high speed rail service in the NYC-Albany-Buffalo corridor and establishing quality connection to that service would be a significant opportunity."

In addition, the Housatonic freight line is an important part of our business economy, as it serves several local businesses accounting for about 1,000 local jobs. The continued viability of this line is important to this region. We also note that, in the event there may be future passenger rail service south through Connecticut, making improvements now to freight capacity will facilitate future conversion to passenger service, which would be a significant benefit to the region.

**1. The Western Massachusetts Passenger Rail Study should extend at least to Pittsfield and consider improvements at less than high speeds.**

Although we support the proposal to study improvements in passenger rail service to Western Massachusetts, the Draft Plan is flawed because it limits the potential of the needed study two ways. First, the scope of the proposed study apparently would not go west of Springfield. Although the name "Pittsfield" appears in the list of projects in Table 3-1 on page 84 of the Draft Plan, all of the detailed descriptions of this study include nothing west of Springfield. See, for example, study descriptions on pages 11, 85-86 and 108. As a result, the study does not include the western fifth of Massachusetts (the Berkshires) which is poorly served by all forms of transportation, and has an economy which is among the weakest in the Commonwealth. Western Massachusetts beyond Springfield should not be ignored or excluded from this study. As long as

a study to Western Massachusetts is undertaken, it should be complete in its geographic scope, and let the data from the study influence exactly what upgrades or projects are feasible. Extending the study area west of Springfield would also mean learning how to take advantage of the strong passenger rail assets to our west along the Hudson River in New York State. We believe the study area should be extended to the west beyond Springfield at least to include Pittsfield.

Second, the study description seems to presume that certain high speeds might need to be achieved along the entire corridor. If this is so, then the proposed study may miss opportunities to study options at lower speeds that would require a less expensive investment but fill an important transportation need. Having the study look only at high speeds may result in the omission of looking at very important improvements in service that might not qualify as ‘high-speed’. It would be preferable to require a study of passenger rail access at all speeds, and allow considerations of lesser speeds in areas where high-speed may not be practical due to constraints such as track geometry and topography. High-speed rail would be preferable but, where not feasible, improvements at lower speeds would still provide a great benefit to the Berkshire region.

We urge the DOT to make these two modifications in the final State Rail Plan so that the study may be of benefit to all of western and central Massachusetts.

On a related note, we were dismayed, but perhaps not surprised, that the passenger train serving Pittsfield is documented as having a terrible on-time performance. The data in table 2-6 on page 52 reports recent on-time data from the Lake Shore Limited (the only passenger train serving Pittsfield) as about 39%, while the other three train lines listed range from about 63-92%. To be attractive to travelers, train service must be reliable, so we urge DOT to look into the causes of this pattern of delays and to identify and implement improvements to this service.

**2. The final Rail Plan should incorporate the findings and recommendations of the Berkshire Flyer study.**

The Draft Plan notes the existence of the ongoing Berkshire Flyer study, which is examining seasonal passenger rail service between Pittsfield and the greater New York City region. See pages 28, 89 and 107 of the Draft Plan. We are grateful to the legislature for mandating this study, and to the DOT for leading it. Passenger rail service that would bring to the Berkshires additional visitors from the New York City metro region would assist the Berkshires economy, especially those many tourist, hospitality and cultural attractions that are spread throughout the region. The Berkshire Flyer Study is due March 1, 2018 and appears to be on schedule for completion, so we request that the results of that study be reported in the final version of the State Rail Plan, with an appropriate reference to where the study can be found.

**3. The Rail Plan should pursue upgrades to the Housatonic Line that would sustain freight service and facilitate future implementation of passenger service.**

The Housatonic Line from Pittsfield down to Connecticut and points south is an important component of the Berkshires economy, used for freight shipments by several local businesses

and supporting about 1,000 jobs. The Draft Plan reports this rail line generates almost \$200 million in economic output and \$60 million in labor income. See Draft Plan page 17, table 1-1. It is critical that the line be maintained in a State of Good Repair so that freight service can be sustained without interruption. The Draft Plan pays little attention to the current freight operations of the Housatonic Line, though we note there are a series of projects listed in Appendix A, page 117 Table A-4 ( there called the Berkshire Line). The Draft Plan does not give enough information to permit an evaluation of the adequacy of these projects, but we urge DOT to ensure sufficient improvement to maintain and enhance the reliability of freight service.

The Draft Plan summarily dismisses the idea of passenger service from Pittsfield southward to Connecticut and the New York rail system on the Housatonic Line, generally alluding to costs and the current lack of interest by Connecticut in upgrading tracks within its borders. See pages 14, 85 and 104. We request that much more attention be paid to studying the feasibility of passenger service on the Housatonic line since the economic benefits to the region would be substantial. The expected economic benefits are recently summarized in the Berkshire Regional Planning Commission's Berkshire Passenger Rail Station Location and Design Analysis (2014). The benefits in terms of job creation, increased tourist visits and taxes are highly significant. This option deserves further inquiry than the cursory conclusion that is contained in the Draft Plan.

As an initial matter, we understand that improvements to freight operations would facilitate future conversion to passenger service, so we urge DOT to plan and implement upgrades on this line with an eye towards readiness for future passenger service. In addition, the Final State Rail Plan should be amended to include a specific discussion of costs of conversion to passenger service or, if those costs are not available, a commitment to study the costs so there can be a basis for further and more informed decision-making. The Final State Rail Plan also should include more detail on what efforts DOT has made to discuss this with Connecticut and what that state's position is. It would be inappropriate for the Final State Rail Plan to relegate the prospect of passenger service to the 'no-action' tier without further understanding and explanation of costs and of opportunities with Connecticut.

Thank you for your consideration and please feel free to contact me with any questions or concerns.

Sincerely,



Michael Case  
President  
Berkshire County Selectmen's Association  
c/o 177 Schulze Rd  
Washington, MA 01223  
Telephone: 413-281-4333