



November 19, 2020

Stephanie Pollack, Secretary and CEO  
Massachusetts Department of Transportation  
10 Park Plaza, Suite 4160  
Boston, MA 02116

RE: East/West Rail Study Comments

Dear Secretary Pollack,

We appreciate the effort that has gone into the East/West Rail Feasibility Study which evaluates options for expanded passenger rail service across the Commonwealth. As you are aware, Berkshire County has very limited rail service and this study is a key first step in bringing about regularly scheduled service that will connect our region to other parts of the state. Our comments are intended to strengthen the integrity of the study and to clarify recommendations that will serve to set the direction for future efforts and lead to the implementation of reliable passenger rail service.

#### Updated Cost Estimates

Price estimates for the rail infrastructure improvements appear to be high and may overestimate the actual cost. It is recommended that a new price estimate for the improvements be developed by an organization whose main work is rail construction. This would likely improve the benefit cost ratio and provide a cost savings when the project proceeds to bidding/construction. Directly related to this, future efforts should focus on identifying ways to drive the cost down through innovation such as design build and public/private partnerships.

#### Rail Service Operations and Oversight

Discussion should be included regarding MassDOT's ability to provide oversight on passenger rail services. Options should be explored and evaluated to determine the approach to providing oversight on statewide rail programs and operations. Public-private partnerships should also be investigated and assessed which may result in substantial cost savings and reduced financial risk.

#### Economic Benefits

The Benefit Cost analysis could be improved by taking into consideration the indirect economic benefits which will result from enhanced rail service. This new service will increase economic activity and add new jobs; increasing ridership above what is reflected in the study. This effect stemming from increased economic activity should be reflected in new ridership projections and the recalculation of the

benefit cost. The draft report recommends working with local and regional governments to facilitate land use decisions. The final report should also include a recommendation for MassDOT to work with and actively engage local and regional governments to identify indirect economic benefits.

#### Commitment to Further Progress

Most of the recommendations contained in the draft study require further effort. MassDOT should commit to providing the necessary staff support and resources to move identified actions along and insure that they be completed in a professional and expeditious manner and do not languish. The final report should include a schedule for MassDOT to complete these efforts.

#### Preferred Alternative

BRPC recommends that the 4/5 hybrid be selected as the preferred alternative. It provides the fastest travel time, has the largest number of daily trains, and has the greatest potential for this alternative to achieve success. The draft report recommends keeping Alternatives 3 and 4 under consideration until additional information is known. It is recommended that only one alternative, the 4/5 hybrid, be selected as the only alternative so that it can be expeditiously advanced in greater detail.

#### Travel Time Improvement

The maximum speed between Springfield and Pittsfield is indicated as being 59 miles per hour. This is the slowest speed rating along the entire route. Improvements should be identified that would increase the average speed of 44 mph and improve the travel time of 1:12 hours between Pittsfield and Springfield.

#### Corridor Acquisition Analysis

All the alternatives developed in the study are based on the premise that CSX will remain the owner and based on CSX passenger rail requirements that are overburdening and costly. This has resulted in a significant number of improvements being required for the proposed service which come with a significant price tag. An alternative approach could be to acquire the corridor from CSX. A cost analysis could determine the price point where it would be more cost effective to acquire the corridor and lessen the amount of CSX required improvements. Also, by acquiring the corridor, passenger service would not suffer from operation decisions being made by a freight railroad.

#### Construction Phasing

It is recommended that construction of system upgrades for the preferred alternative, 4/5 hybrid, emanate out of Springfield in a simultaneous manner towards both Pittsfield and Worcester. This will serve to insure that connectivity to Pittsfield does occur and occur much sooner in comparison to construction of improvements beginning in Boston or Worcester and moving west

### Operating and Maintenance (O/M) Costs

The document lacks detailed data on O/M costs for the various alternatives. At a minimum, this information should be provided for the 4/5 hybrid alternative. This information is critical to determine the price point for tickets and to determine what level of subsidy will be necessary. Please add this information to final document along with any other anticipated revenue. Related to operations, the RTC rail corridor capacity analysis was not mentioned in the draft. Please add a discussion and include the analysis in the appendix to the final report.

### Service Connection to Albany

The study's recommendations should advise that this new east-west service should connect to Albany/Rensselaer and that MassDOT Rail and Transit Division initiate discussion with Amtrak and NYSDOT. By adding this 37 mile segment, additional options are created and can further increase ridership and provide additional economic opportunities.

### Engage CSX

For this new service to become operational, approval from CSX is required. Conversation with CSX should begin immediately to be able to implement this east-west service in a timely manner. Waiting for some future point to start a dialogue would likely lead to further delays. Also, these discussions can be used to determine if CSX has any interest in selling this corridor.

### Green House Gas Emission (GHG) Reductions

This study determined that the displacement of vehicles and mode shift to rail will not provide a net reduction in emissions due to high level of pollutant emissions from the locomotives. The study should recommend that more attention be given to identifying a cleaner fuel or another locomotive type that has lower emissions and results in lower GHG emissions.

### Legislation and Funding

The final document should include a discussion on appropriations and authorization legislation to secure funding for this rail project at both the State and Federal level. Including policy recommendations for funding and corresponding amounts will assist legislators as they develop their bills to acquire funds. The study is limited in its discussion on other potential funding sources and at a minimum a list of funding sources should be included.

We appreciate the opportunity to provide comments on the draft East/West Passenger Rail Study and trust that these comments will be addressed in the final document. BRPC is committed to improving mobility options in the region and looks forward to working with MassDOT in advancing this effort through to service implementation.

These comments were endorsed by the Berkshire Regional Planning Commission at its meeting on November 19, 2020.

Sincerely,

Thomas Matuszko, Executive Director

cc: The Honorable Charles Baker, Governor  
The Honorable Edward Markey, U.S. Senator  
The Honorable Elizabeth Warren, U.S. Senator  
The Honorable Richard Neal, U.S. Congressman  
The Honorable Adam Hinds, Senator, Berkshire, Hampshire, Franklin & Hampden District  
The Honorable John Barrett, Representative, 1st Berkshire District  
The Honorable Paul Mark, Representative, 2nd Berkshire District  
The Honorable Tricia Farley-Bouvier, Representative, 3rd Berkshire District  
The Honorable Smitty Pignatelli, Representative, 4th Berkshire District

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