## DRAFT~DRAFT~DRAFT

October 13, 2010

David Mohler, Chair Transportation Planning and Programming Committee Boston Region Metropolitan Planning Organization 10 Park Plaza, Suite 4150 Boston, MA 02116

RE: Draft Massachusetts State Rail Plan

Dear Mr. Mohler,

The Regional Transportation Advisory Council's Freight Committee has reviewed and discussed the draft Massachusetts State Rail Plan. The Advisory Council commends the extensive effort of your planning staff and consultants that developed the Rail Plan. We appreciate the depth of information describing the current condition and use of the rail infrastructure in the state. The Freight Committee has expressed their concerns and comments to the Advisory Council and we share our greatest concerns about freight and passenger rail here with you for the MPO to consider in its ongoing transportation planning and programming work. We also submit these comments for consideration as your office finalizes the Rail Plan.

The Advisory Council shares with its Freight Committee several concerns. Members are worried about the projected 70 percent increase in freight volume between now and 2035. It disappoints the Advisory Council that the share of freight transported by rail is projected to only increase by approximately one percentage point during this period of time. The increase in freight traffic and continued heavy reliance on trucks will lead to more large trucks using already congested roads and highways in the region. We also are concerned about the highway system's ability to handle additional passenger travel. The current path for both freight and passenger transportation is not sustainable. Members of the Advisory Council are also concerned that communities often make land use decisions that threaten viable industrial land and limit opportunities to develop a strategic multimodal transportation and distribution system. Investing in the Commonwealth's rail system and preserving land uses vital to the distribution of freight will reduce traffic congestion, improve air quality and reduce greenhouse gas emissions, induce economic development, create jobs, and improve the quality of life for residents of Massachusetts.

The Advisory Council offers the following suggestions for improvements to the draft Rail Plan and for the MPO's ongoing transportation planning and programming work:

• The Rail Plan should define strategies to connect the region's ports to its freight rail network. This will support short sea shipping and help alleviate highway congestion.

- The Rail Plan should define strategies for sharing state-owned rail right of way between passenger and freight rail in Eastern Massachusetts.
- The planned relocation of the state's freight rail terminals from the inner core of the Boston region to Worcester and Ayer should be studied for its impact on highways.
- The Rail Plan should define the strategic role of the Commonwealth's 12 short line railroads. They can provide an alternative to truck drayage into Eastern Massachusetts.
- An Industrial Rail Access Program (IRAP) should be established to help protect vital industrial sites and expand rail infrastructure that is beneficial to the state's economy.
- MassDOT should establish a division to oversee freight operations in Massachusetts with a special focus on the shared use of state-owned rail right of way.
- Freight transportation issues transcend MPO boundaries more than passenger transportation issues. Therefore, MassDOT should establish a freight advisory council at the state level to provide guidance from the users and providers of freight transportation. It should include representation from all modes, shippers, state agencies, and the MPOs.
- Regarding passenger rail, the Advisory Council urges the Boston Region MPO to include the North-South Rail Link in its Long-Range Transportation Plan. It would be a vital link in the rail system of the Boston region and New England and help advance the GreenDOT initiative of MassDOT.

We greatly appreciate MassDOT's leadership and work on the draft Massachusetts State Rail Plan and look forward to the implementation of its recommendations. However, we are concerned by the short public comment period. We would like MassDOT to conduct more public outreach on the draft Rail Plan and welcome a presentation of its findings to the Advisory Council.

Sincerely,

Laura Wiener, Chair

DRAFT~DRAFT~DRAFT~DRAFT