

304098

March 14, 2022

The Honorable Martin J. Oberman, Chairman
Surface Transportation Board
395 E Street SW
Washington, DC 20423

ENTERED
Office of Proceedings
March 14, 2022
Part of
Public Record

Dear Chairman Oberman and Members of the Surface Transportation Board,

The safe and reliable movement of people and goods is crucial for maintaining a strong economy and for improving mobility in Massachusetts. As you consider the issue of rail reciprocal switching, we wanted to offer perspective from the local level in Massachusetts.

The Commonwealth's 1,057-mile freight railroad network helps alleviate the burden on our roads and bridges by removing several hundred truckloads from congested freeways with each train trip. Our economic future also relies on partners across the economy, including the freight railroads that have helped us attract new warehousing, distribution, and manufacturing operations.

The freight corridor that parallels Interstate 90 and Route 495 is a particularly important link to the national rail network. Our regional freight network also offers manufacturers and distributors in rural areas a cost-effective way to ship and receive products such as frozen fish, cranberries, building materials, chemicals, pulp and paper, scrap, and metal.

A well-utilized system of passenger and freight rail has many benefits for the Commonwealth and our residents – improved connectivity, greenhouse gas reduction, travel time savings, and economic development. It is our concern that forced switching as proposed in EP 711-1 would imperil the efficient rail service that Massachusetts shippers and passengers rely on, and lead to disinvestment across the rail network.

Despite supply chain disruptions in recent months, railroads have remained a steady conduit for freight. The rail network's resiliency—its ability to serve customers and compete with other modes—hinges on the ability of rail companies to pay for the upkeep of their infrastructure. But the proposed rule compels railroads to make their operations less efficient by introducing complications that slow service for most customers. Over the long term, Massachusetts shippers will turn away from rail, further jeopardizing investment.

Rail labor groups, passenger railroads, several major shippers, environmental groups, and many other local and state leaders from Massachusetts are also on record expressing their concern about introducing more instances of reciprocal switching across the rail network. The National Wildlife Federation, for example, has noted that disruptions due to switching could “shift to more carbon-intensive modes of transportation.” An additional factor to consider is the potential harm to Massachusetts' passenger rail expansion efforts. Amtrak opposed mandated switching when it was last considered in 2016 because of the potentially disruptive impact on its routes hosted by freight carriers.

We all want a transportation system that strengthens our economy and our communities, while also being safer, more affordable and more reliable. Federal policies should continue to reflect a balanced regulatory system that encourages growth and reinvestment in the rail network. A dependable freight rail system is essential for businesses to compete and for communities to thrive in Massachusetts.

Thank you for your consideration of this local perspective. We ask that you reject the switching mandate.

Sincerely,

Anne Gobi
State Senator
Massachusetts General Court

Timothy Murray
President and CEO
Worcester Regional Chamber of Commerce

Adam Gomez
State Senator
Massachusetts General Court

John Read
Secretary
New England Railroad Club

Massachusetts Taxpayers Foundation

Rick Sullivan
President and CEO
Western Mass Economic Dev. Council

CC: Members of the Massachusetts Congressional Delegation