

July 13, 2018

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Ms. Cynthia T. Brown
Chief, Section of Administration
Office of Proceedings
Surface Transportation Board
395 E Street, S.W., Room 1034
Washington, DC 20024

**RE: Docket No. AB 1256
Boston & Me Corp and Springfield Term. Rwy Co.
Application for Adverse Discontinuance of Operating Authority - Milford-Bennington RR Co.**

Dear Ms. Brown:

The Nashua Regional Planning Commission (NRPC) is writing to express its opposition to the request by the Boston and Maine Corporation and the Springfield Terminal Railway Company, collectively known as Pan Am, to discontinue the operating authority held by the Milford-Bennington Railroad Company over a rail line on the Hillsborough branch. NRPC is deeply concerned about the negative impact that such action could have on this region.

NRPC serves as the Metropolitan Planning Organization (MPO) for the Nashua NH Urbanized Area (UZA). The MPO is the transportation policy-making organization for the region. It is made up of representatives from local government and transportation authorities, including NHDOT, FTA, FHWA and Nashua Transit System. The purpose of the MPO is to administer the federal transportation process.

In 2012, Federal transportation legislation known as *Moving Ahead for Progress in the 21st Century (MAP-21)* was adopted. The legislation required states and MPOs to adopt a performance-based approach to transportation planning in order to track the effectiveness of planning efforts, identify needed transportation-related improvements, and ensure that funding and other resources are dedicated to sectors that need improvement. The performance measures requirement was preserved in subsequent legislation known as the Fixing America's Surface Transportation (FAST) Act. Current federal law specifies national performance goals to be tracked by states and MPOs (23 CFR 490), including safety, infrastructure condition, congestion reduction, freight movement, economic vitality, and environmental sustainability. The Nashua MPO is required to include performance measures in its Metropolitan Transportation Plan (MTP)

The Milford-Bennington Railroad Company plays a key role in meeting the required performance measures set out in the FAST Act. The company provides critical rail freight service to the region by moving raw materials between a quarry and a processing plant in two neighboring towns. This dramatically reduces the number of heavy trucks that would otherwise be needed to transport the same raw materials over state and local roadways. If freight service were to be discontinued, it would result in reduced pavement life on

existing roads, increased heavy truck congestion within a key regional transportation corridor and increased emissions which would adversely impact air quality. Additionally, the useful life of a bridge along the truck route would be significantly reduced with the passage of so many additional heavy trucks. Further, there are economic benefits to continued and expanded freight service along this corridor as well as economic benefits from the planned reintroduction of the Wilton Scenic Railroad passenger service on this line.

The Nashua MPO urges the Board to closely examine the pending petition for waiver and future filings to ensure that the importance of Milford-Bennington's rail service to our region's transportation system is protected. Thank you for your consideration.

Sincerely,

NASHUA REGIONAL PLANNING COMMISSION



Jay Minkarah
Executive Director
jaym@nashuarpc.org

cc: Victoria Sheehan, NHDOT Commissioner

I certify that I have this day served copies of the document upon the Parties of Record in this proceeding, by U.S. Mail or E-mail.

Signature: _____

Karen M. Baker

Date: _____

7/13/18