

**STATEMENT OF THE RAIL USERS' NETWORK (RUN) CONCERNING NEC FUTURE
SCOPING**

September 12, 2012

The Rail Users' Network, Inc., otherwise known as RUN, is a not-for-profit corporation of national scope chartered in the State of Maine. Our members are individuals and organizations concerned with improving passenger rail service and local rail transit in the United States and Canada. Our organizational members are rail passenger advocacy organizations, as well as transit advisory committees, appointed by transit providers under statutory authority. We also have individual members, who are concerned citizens. We are an all-volunteer civic and educational organization.

RUN's mission is to advocate for improvement in passenger rail service, whether on Amtrak or on local and regional passenger railroads, as well as transit systems. In this context, RUN is concerned with the quality of the rail passenger experience and level of service on Amtrak, in the Northeast Corridor (NEC) and elsewhere. That includes connectivity between Amtrak trains and those of such local/regional carriers as Metro-North, New Jersey Transit and SEPTA, so that travelers can get from one place on the NEC to another, with a minimum of difficulty and wasted time.

RUN wishes to make recommendations concerning the substance of rail services in the region, but first, we make the following suggestions to improve the procedure of the "NEC Future" process.

PROCEDURAL RECOMMENDATIONS

RUN is concerned that the public must have an adequate opportunity to participate in the entire "NEC Future" process, from the current scoping stage through final issuance of a Record of Decision (ROD). We express our concern that the public did not have enough opportunity to prepare statements and otherwise participate effectively in the process. We note that public notice was released on August 8, 2012, only five days before the first scheduled scoping meeting, held in Boston. We express our concern that such scheduling does not comport with the traditional 30-day notice of such events that is normally given to the public. We also note that the 32-page "Scoping Package" document was not available in hard copy for members of the public to take with them and review. Accordingly, any person who desired to make a statement, and did not or was not able to review the document on the project web site, was forced to speak without the benefit of having reviewed this information.

We view these deficiencies as an indication that project management does not view its obligation to involve the public seriously enough to implement that obligation appropriately. Therefore, we request that the scoping phase be re-opened for public participation for an additional sixty (60) days, and that the rest of the process be rescheduled accordingly. While we applaud the F.R.A. for extending the comment period an additional 35 days, we believe that is still insufficient given the magnitude of this project.

We call for the establishment of Regional Citizens' Liason Committees (RCLCs) throughout the Northeast Region to provide a regular channel of communications between project management and concerned citizens. This was done in the 1990s on the Access to the Region's Core (ARC) and Portal Bridge Capacity Enhancement Projects in New Jersey. Some of the members of the management team on this project were involved with those projects as well, and remember the RCLC process from those projects. Accordingly, project management can replicate that process on the current project, and expand from a single RCLC to such committees on a regional basis, with channels of communications between the various RCLCs, so they can exchange information and share ideas concerning the project. We expect that members of these RCLCs will also be members of local, statewide and national rail and transit advocacy organizations, as well as other concerned individuals. We call for a diversified array of stakeholder organizations and individuals to be represented. We also call for monthly updates to be given to all interested persons and organizations, so that everyone concerned will be fully informed between meetings, as well as at meetings.

SUBSTANTIVE RECOMMENDATIONS

Many members of RUN, including members of the organization's Board of Directors, live in places that are served by both Amtrak trains and local rail transit. Although RUN is a national organization, many of its members live in the Northeast Region and use Amtrak's NEC trains, as well as those of regional "commuter" rail carriers. Accordingly, RUN and its members recognize the importance of using the NEC infrastructure efficiently for Amtrak, regional rail carriers and freight.

RUN calls upon the FRA to exercise its oversight authority to ensure that the use of the NEC infrastructure is not only efficient, but also equitable for all users, including Amtrak passengers and riders on the regional "commuter" railroads. We define the term broadly, to include riders who use the railroads at any time, not only traditional peak-hour commuters, but all riders at all times. We recognize that only the FRA has the authority to ensure such efficient and equitable use. RUN calls for the FRA to take the lead in coordinating the use of the railroad between Amtrak, the regional railroads and freight. This also includes coordination between regional carriers, to ensure the best connectivity for riders between Amtrak and local trains, and between local trains operated by different carriers. Without such administrative leadership, the public will not enjoy the most efficient use of the railroad, with the consequent cost of such inefficiency. This should be done in consultation with the advocates for the riding public, as well as other stakeholders, on a permanent and continuing basis.

We call for an emphasis on projects that can be completed in the near-term, and in a manner whereby each phase of a project will yield independent utility. We note that Amtrak's Next Generation ("Next-Gen") high-speed rail program requires a planning frontier that extends until 2040, and that Amtrak's "Gateway" Project would not be completed until 2025, with no independent utility for any portion of the project to be derived, as the project is built. RUN has not endorsed the "Gateway" Project, and believes that a phased implementation of improvements in the New York City area would be preferable. RUN also calls for a new 2-track extension to Grand Central Terminal on the East Side of Midtown Manhattan, which NJ Transit would use, so

that commuters and other rail riders from New Jersey and beyond will have access to both the East and West Sides of Manhattan.

Certain rider advocates in the New York and New Jersey area have called for approaches to new trans-Hudson infrastructure and mobility that are different than the Amtrak Gateway proposal. This includes a phased-implementation approach that would build a third track from the New Jersey Meadowlands to Penn Station, followed by a fourth track, along with associated switching and other infrastructure improvements. The final stage would be the extension to Grand Central Terminal. RUN calls for this project to be given thorough study as a preferable alternative to the Amtrak Gateway proposal, due to the independent utility of each stage, the lower price for the entire project, and the earlier potential completion date, compared to Gateway. There is also a proposal for a new route to Manhattan via Hoboken. RUN believes this plan should receive serious study as well.

RUN calls for projects that create the most utility for the lowest cost, along with projects that are most urgently needed, to be completed first. An example is the proposed improvement to the Baltimore Tunnels, which must be completed sooner, rather than later. In another example, the Metro-North portion of the NEC from New Rochelle should be upgraded to four tracks and the catenary replaced, so travel on that part of the line is at least as fast as on the rest of the line to Boston. Bridges in Connecticut should be rebuilt at a sufficient height so that there would be no further conflict with boat owners, who have succeeded in blocking service improvements in that state, including improvements in Boston service. Together, these improvements would greatly improve service to and from Boston.

RUN believes that the project should define the NEC as broadly as possible, to recommend and implement projects that will enhance the public welfare. "Branch" lines of the NEC should be considered part of the study area, so that trains on those lines will maximize the availability of rail transportation, through scheduling for efficient connections, as well as scheduled through-running. Those lines include New Haven to Springfield, Philadelphia to Harrisburg and the Empire Corridor from New York City to Upstate New York. We note that local rail services operate on some of those lines today, and that there are plans to establish such services in other parts of these lines in the future. We note that some riders go beyond the NEC to the Downeaster trains to Maine or Amtrak trains south of Washington, D.C. to points as far away as Miami or New Orleans. Amtrak and its long-distance trains should be part of the NEC study, especially with respect to scheduling those trains to meet the needs of riders, along with the freight-carrying railroads, over whose track they operate.

We believe that it is vital to use the capacity of the NEC and lines whose riders connect with NEC services to the greatest possible extent, for the public good. Accordingly, we believe that capital improvements should be built with this over-riding principle in mind. We note that, because of high Amtrak fares on its NEC trains, many price-conscious travelers are choosing to take buses between city pairs in the region. We recommend that steps be taken to introduce a viable rail alternative for price-conscious travelers, which would serve to divert such travelers from

buses on highways to the rails of the NEC and connecting lines. Amtrak should purchase or lease additional coaches for conventional trains to increase capacity for such riders; lengthening only premium-fare Acela trains is not enough, although the Acela trains should be lengthened.

We also call for any potential high-speed project to be designed and implemented to maximize useful connectivity with existing rail infrastructure, rather than a totally separate system. We note that European high-speed rail systems run on “conventional” rail when traveling through urban areas and use existing stations for transfer to and from conventional trains. We call for a similar approach in the NEC, as a means of saving on construction costs, maximizing the efficiency of using existing infrastructure, and increasing the convenience for travelers.

In the short run, there should be more trains on Amtrak, with better amenities. Dining cars should be offered on trains traveling south of Washington, D.C. to such destinations as Newport News, Lynchburg and Norfolk (service scheduled to begin this December). Premium “business class” or “Parlor Car” service should be offered whenever sufficient riders can be induced to pay for such service. Features such as regional food specialties and sightseeing commentary should also be offered to induce riders to use the trains for discretionary travel. Along with these improvements, the frequency of service on Amtrak should be increased. Half-hourly conventional train service should be operated when and where customer demand warrants. If an “economy” service could compete successfully with intercity buses, it should be offered.

We look forward to receiving the response from Project Management to these comments and proposals, and we hope this is the start of a dialog that will continue throughout the project's process.

Sincerely

Dr. Richard H. Rudolph
Chair
Rail Users' Network
55 River Road
Steep Falls, ME. 04085
207-776-4961