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Department of Transportation
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via email: DOTPLANNING@CT.GOV

On behalf of the Sierra Club Connecticut Chapter and our more than 40,000 members and supporters in the state, thank you for the opportunity to provide public comment on the Connecticut State Rail Plan 2021-2025.

The Sierra Club is committed to solving the climate crisis with just and equitable solutions that will result in a healthy world for everyone. The climate emergency is happening now. The science is well understood and clear, we need to be undertaking an all-out effort to decarbonize our economy to avoid the worst future impacts of the climate crisis. In recognition of the need to decarbonize, Connecticut enacted the Global Warming Solutions Act requiring a reduction in greenhouse gas (GHG) emissions by 45% below 2001 levels by 2030 and 80% by 2050. Transportation accounts for 38% of greenhouse gas emissions in Connecticut, and the Connecticut State Rail Plan can play an important role in advancing climate policy while achieving its goals and objectives for rail service within Connecticut and between New York, Massachusetts, Rhode Island and the Northeast.

The Connecticut State Rail Plan can also be a catalyst for equity in transportation. The Governor's Council on Climate Change Phase One Report¹ provides guidance on equity in state policy planning and investment, stating "The principles of equity mandate that race, national origin, socio-economic status, religion, gender identity, gender, disabilities, sexuality, or other facets of identity must not inhibit a person's access to resources, including basic necessities such as safe shelter, water, food, heat, and light, as well as opportunities for safe employment to support oneself and one's family, equal access to community supports such as public education, public transportation, healthcare and mental health care." The report continues "Equitable planning includes core concepts of distributive and procedural justice: it considers existing disparities and provides communities with meaningful opportunities to participate in the policy processes.

As you develop this plan, Sierra Club Connecticut recommends that the goals and objectives for rail service in Connecticut align with the climate and environmental objective of the state and that the Connecticut State Rail Plan 2021 - 2025 specifically aims to reduce greenhouse gas emissions in the transportation sector, reduce vehicle miles traveled (VMT) and prioritize the equitable input into the process and distribution of the benefits of rail investments. To support achieving these goals, we urge the following to be included in the plan:

¹ https://portal.ct.gov/-/media/DEEP/climatechange/GC3/GC3_Phase1_Report_Jan2021.pdf

CTDOT should consider using all existing railroad beds (both public and private) to the maximum extent possible to provide the public with an alternative to the use of Connecticut's highways and roads for transportation. This will increase car-free transportation options, reduce GHGs emissions, traffic congestion, human stress, cost of travel and travel delays. This will reduce costs for new expanded highways and bridges, and the ever-present costs of maintaining these facilities. Establishing this vision will make Connecticut a more competitive and sustainable place to live, work and play. To support achieving these goals, we urge the following to be included in the plan:

- **Electrification:** Electrifying passenger and freight rail will reduce greenhouse gas emissions and improve air quality helping to meet Connecticut's climate goals while at the same time improving public health. Currently, the New Haven Main Line, the New Canaan Branch Line, and the Shoreline are electrified and the Waterbury and Danbury branch lines and the Springfield Line are not electrified. The USDOT has designated the Hartford line as a High-Speed Rail Corridor and electrification is necessary for high-speed service, and will provide better integration with the NEC. Electrification will also improve air quality in rail yards that serve all lines.
- **Renewable Power:** In addition to electrification, the source of power for rail should transition from fossil fuels to zero-carbon electricity sources. DOT should commit to zero-carbon electricity sources by 2030. Similarly, rail stations, rail facilities and long-term maintenance and construction projects should include solar installations where appropriate, and zero-emission all-electric heat pumps to replace HVAC systems.
- **Improvements:**
 - **Hartford line** - Completion of double tracking on the Hartford line, which connects the three counties with the largest and growing populations in the state. Fully integrate services on the Hartford Line and Valley Flyer so that there is essentially one service corridor between Greenfield and New Haven. Add northbound weekday trips to the schedule that allow arrivals before 9 am in Springfield.
 - **Metro North** - Double tracking, high-level platforms (where missing).
- **Extensions and Expansions:**
 - **Shoreline East.** Expand Shoreline East to Rhode Island where it could meet with the Massachusetts Bay Transportation Authority (MBTA) at Wickford Junction. In addition to providing interconnectivity with our neighbors, extending Shoreline east can help mitigate the impact on road traffic that is anticipated based on job growth in the industrial centers of Southeast Connecticut.
 - **Hartford Line.** Extend passenger service via the Hartford line or light rail to Bradley Airport. Extend service to Mansfield to serve UCONN from the Hartford line.
 - **Danbury Line.** Extend the Danbury line to Massachusetts. Extending the line would improve mobility options to the north and potentially reduce vehicular congestion.
 - **Waterbury Line.** Extend the Waterbury Line to Torrington to provide some service to Litchfield county, which currently has none. This project could be implemented fairly quickly given that it is entirely state-owned. Expand service to Winsted. Extend Service from Waterbury to Hartford on the existing Pan Am freight line from Waterbury to New Britain/Newington to reach the Hartford area. There are no East-West connections in the

state except for the NEC. Restoring Waterbury-Hartford service would enhance the Capital District.

- New London - Willimantic has no passenger rail service. As noted in the 2012-2016 plan, utilizing freight lines, passenger service could be developed from New London north with stops in Uncasville (Mohegan Sun), Norwich, Willimantic, Mansfield/Storrs (UCONN), and Stafford Springs, and continue to Massachusetts with stops at Palmer, Amherst, and Millers Falls and then to Brattleboro, Vermont where passengers could connect to Amtrak trains to Vermont and ultimately Canada.
- Groton – Norwich via the Providence & Worcester Railroad. This line has no regular passenger service currently, just short haul freight. Recent legislation has authorized and funded the CTDOT to undertake a feasibility and operational study to establish new commuter branch service to connect with Shore Line East on Amtrak in Groton. The study includes authorization to study new train station stops in Groton, Stonington and Norwich solving last mile issues for the US Navy, Electric Boat and Pfizer. In addition, the legislation includes considering how to link other ground transportation with the rail passenger services.
- Intermodal planning and investments. As noted in the 2012-2016 plan, “intermodal connections to maritime, air, bus transit, and highway modes as well as improved transit and bike/pedestrian links are important elements of an efficient and effective rail transportation system.” We urge the 2021-2025 plan to provide details about plans and investments in bike, scooter, pedestrian and other intermodal enhancements to rail stations, industrial centers, and nearby transit-oriented development zones. These issues deserve at least as much attention and detailed analysis as parking, and can and should be planned with the goal of increasing the number of passengers arriving car-free, and solving first and last mile issues. In addition, bike, scooter and electric vehicle sharing opportunities should be analyzed with the goal of reducing GHG emissions.
- Amenities and marketing. To make passenger rail more convenient to those already using it and an attractive alternative to the use of privately owned vehicle (POV), the Rail Plan will need to consider improving the public’s desire to use trains by providing a modern, high quality experience including schedules to meet the public needs, regular on-time service, clean and well maintained cars and stations, have Wi-Fi and appropriate electrical outlets, easy electronic ticketing system(s), a fare system designed to attract and keep customers, and, as appropriate, food and beverage services. This will require an ongoing and effective marketing and communication system to and for the public.
- Freight. Sierra Club Connecticut will participate in the Statewide Freight Planning process and expects more specific recommendations to be developed that can help inform freight rail planning. Decreasing greenhouse gas emissions, increased use of existing freight lines, and shifting diesel truck traffic away from Environmental Justice communities are among our organization’s priorities for freight in Connecticut.

Thank you for the opportunity to comment, and your consideration of our recommendations for inclusion in the Connecticut State Rail Plan 2021-2025.

Sincerely,

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