



Town of West Springfield

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Via E-Filing

Ms. Cynthia T. Brown
Chief, Section of Administration
Office of Proceedings
Surface Transportation Board
395 E Street, S.W.
Washington, DC 20423-0001

ENTERED
Office of Proceedings
January 18, 2022
Part of
Public Record

Re: *STB Docket No. FD-36472, CSX Corporation and CSX Transportation, Inc., et al. Control and Merger—Pan Am Systems, Inc., et al.*
Town of West Springfield Written Comments

Dear Ms. Brown:

Please accept this letter as written comments submitted on behalf of the Town of West Springfield, Massachusetts ("West Springfield") in opposition to the Application pending in the above-referenced proceedings. West Springfield joins in the written testimony submitted by Congressman Richard E. Neal (MA-01) and provides the following additional information for consideration.

The expansion of operations by CSX Transportation Inc. ("CSX") will have a direct and substantial impact on West Springfield and its residents. CSX owns and operates an intermodal terminal and large rail yard in West Springfield, which is its largest yard in New England. The current operations of CSX have created a significant public safety hazard for the residents of West Springfield, which is sure to be exacerbated by this merger. CSX has not been responsive to West Springfield's concerns and has been virtually unwilling to work with the Town to resolve the issue that is created by the location of CSX's yard and its trains.

In addition, West Springfield supports the creation of an East-West rail system in Massachusetts and has concerns as to how this proposed merger would affect the development of that rail system. West Springfield joins in the requests made by the Commonwealth of Massachusetts Department of Transportation and Massachusetts Bay Transportation Authority, that any approval of the Application include a condition that CSX commits to working with the Commonwealth to expand passenger service in Western Massachusetts.

During my tenure as Mayor of West Springfield (and well before that), the location of CSX's yard in town has created blockages of a vital crossing (the Front/Bridge Street crossing) to a neighboring community (Agawam). CSX's blockages of this crossing have become so lengthy and frequent, that there is currently an investigation pending before

the Massachusetts Department of Public Utilities regarding the blockages. I have enclosed for your reference a picture depicting the blockage of the crossing, which separates West Springfield from Agawam.

CSX's blockages of the Front/Bridge Street crossing in West Springfield have been a constant source of frustration and anxiety for members of the community. What was once (many years ago) an occasional interruption, has become a regular and extended occurrence within the past decade, causing disruption to public safety services and the lives of residents who use this crossing to travel between communities.

Within the past several years, CSX's blockages of this crossing have become more frequent than ever, often occurring daily and sometimes lasting upwards of an hour at a time. These blockages cause significant disruption to the lives of West Springfield's residents as well as to the operations of local businesses. In addition, the blockages jeopardize public safety, as they interfere with the mutual aid agreement between West Springfield and Agawam for fire and emergency medical services and cause significant delay in the event of a need for mutual aid from one community to the other.

By way of background, West Springfield is a city of approximately 28,000 residents, located in western Massachusetts. Known as the "Crossroads of New England," where the Mass Pike, Route 91 and Route 5 all intersect, West Springfield is a significant travel corridor of the area. West Springfield is approximately 17.5 square miles; its entire eastern border is the Connecticut River and its entire southern border is the Westfield River. Given that two of the city's borders are rivers, there are limited points of access on approximately half of its boundaries.

On the southern border, there are two main local points of access from Agawam, the Morgan-Sullivan Bridge, which is currently undergoing reconstruction by the Massachusetts Department of Transportation ("MassDOT") and the Vietnam Veterans Bridge, located just past the railroad crossing in question, on Bridge Street in West Springfield. The other point of access between the two communities is U.S. Route 5, a non-local highway.

CSX has an intermodal terminal and large rail yard located in West Springfield, just east of both bridges, with an address of 151 Day Street. When an active train stops in the West Springfield yard for any reason, it is almost guaranteed that the Front/Bridge Street crossing will be blocked and passage to Agawam via the Vietnam Veterans Bridge will be impossible. During the Morgan-Sullivan Bridge project, the lanes of traffic on that bridge have been significantly limited and, with that being the only other local point of access to Agawam, there are significant traffic backups whenever the Front/Bridge Street crossing is blocked.

During the planning stages of the MassDOT Morgan-Sullivan Bridge project, elected officials from both West Springfield and Agawam attempted on several occasions to reach out to CSX officials to resolve the issue of the blocked Front/Bridge Street crossing in advance of the Morgan-Sullivan Bridge project. With the Morgan-Sullivan Bridge's traffic capacity being significantly limited by the project, we attempted to

discern from CSX whether there was any way to resolve the blockage issue at the Front/Bridge Street crossing to ensure that residents were not having their day disrupted and that the operations of local businesses were not being impacted.

CSX was unwilling to participate in any measures to mitigate its negative impacts on the local community. CSX refused to provide scheduling information, asserted it was not possible to break the trains at the crossing and CSX representatives essentially indicated that the company was able to do what it wanted due to its status under federal law. It was extremely disappointing that CSX was not interested in engaging with us in an effort to be a good neighbor to those who live and work in the area surrounding its property in West Springfield.

While we attempted to continue the dialogue with CSX, MassDOT volunteered to provide us with a livestream camera at the Front/Bridge Street crossing that the public could access to view in real time to see if the crossing was blocked (this is the same camera by which a Department investigator viewed the violation that is at issue in the instant matter). It was only after MassDOT became involved that CSX finally engaged in discussions with representatives of West Springfield and Agawam. As part of these discussions, MassDOT agreed to provide advance warning signals (which CSX was unwilling to provide) and CSX reluctantly agreed to provide access to its systems to the signals to be installed in each community to notify motorists of the blocked crossing.

While the livestream camera and warning systems have alleviated some of the traffic disruption caused by CSX's blockages, they are merely mitigation measures and not actual solutions to the issue. CSX has been unwilling to meaningfully participate in any type of discussion that involves any effort on its part whatsoever to resolve this issue. It is disappointing and disheartening that CSX so blatantly disregards the concerns of the community in which it does business. In addition to this major issue of the crossing blockage, CSX also refuses to maintain the land surrounding its yard free from rubbish. CSX has also been extremely difficult for our Department of Public Works to deal with in order to coordinate work on our sewer line, located within land owned by CSX, which we have a lawful easement to access to perform maintenance work. While not directly relevant to the issue at hand, it further demonstrates CSX's unwillingness and refusal to engage with the community in which it conducts business.

It seems that the blockages have intensified in the past few years, following CSX's completion of a project in which it raised a bridge in West Springfield, to allow double stacked trains to pass under Route 20. The Route 20 bridge project, which was met with significant opposition from West Springfield, was completed in 2014 and the issues with blockages have become substantially more prevalent since that time. Although CSX denies a correlation between the project and the increased blockages, it is difficult to ignore the fact that the blockages increased following completion of that controversial project, in which CSX again largely ignored the input and feedback it received from West Springfield.

Furthermore, I would be remiss if I did not reiterate that the blockages also are a serious cause for concern related to public safety. As mentioned earlier, West Springfield and

Agawam have a mutual aid agreement for fire and emergency medical services and the blockages at this crossing cause delays in those services, which could be a matter of life and death.

If this Application is approved and the merger is permitted to proceed, it will have a direct and significant impact on West Springfield, as it will intensify what is already a serious public safety issue. Additional business and trains entering and using the yard in West Springfield will exacerbate the public safety concerns that currently exist.

On behalf of the residents of West Springfield and all of our local elected officials, I want to thank you for considering our input on this very important matter. I am sure that you will take the Application and our concerns very seriously. If we can provide any additional information, please do not hesitate to contact my office.

Sincerely,

A handwritten signature in black ink, appearing to read "W. Reichelt", with a stylized flourish at the end.

William C. Reichelt
Mayor

Enclosure

cc: Hon. Richard E. Neal

Photo of Blocked Front/Bridge Street Crossing

