

**Carl H. Fowler**

**A Comment on the December 3 Letter from Joe Flynn to the Mayor**

**December 17, 2019**

The December 3rd letter from Joe Flynn to the Mayor contains an interesting new argument regarding the ETHAN ALLEN. It infers that the Federal Railroad Administration (FRA) might insist that the entire VRS mainline from Rutland to Burlington be treated as a single "territory" (block in railroad parlance) for purposes of dispatcher clearance, when the Amtrak train is enroute between those points--or that even if an exemption was received, there would be a territory covering the full line north of Middlebury to Burlington (after the train arrives there from what would be a Rutland-Middlebury "territory" clearance). Presumably this is related to the absence of block signals and Positive Train Control (PTC) on VRS? No passing track "meets" between active trains would be permitted--even though they are an absolutely routine part of railway operations.

This would be a real problem for VRS, as effectively it allows only one train to be in motion over at minimum 34 miles of line (Burlington-Middlebury) or, in the worst-case example--Burlington to Rutland--67 miles of track. But how does building a less than 900 foot passing track at Union Station resolve this?

This may (theoretically) be required by Amtrak and/or the FRA--but it is not at all typical of the way "Track Warrant" dispatching usually works on railroads nationwide. In general, a railroad's dispatcher issues a train a day/time specific "Track Warrant" clearance to operate a given train between stations and/or what railroaders call "Control Points"--typically between sidings. There may be speed restrictions added within a cleared district if there is maintenance under way, or if there has been, for example, really heavy rain. But to require that 34-67+ miles of a railroad, with existing passing tracks inside those miles of "cleared" track, to operate in this fashion--with no more than one moving train--is not the way this usually works.

If the FRA insisted the ETHAN ALLEN would be the only train operated in a district as long as Burlington to Middlebury (or worse all the way to Rutland) this would impact VRS operational fluidity when Amtrak was in motion. It is useful to note Vermont has already added capacity to the former Rutland RR route, in the form of at least one new passing track and a reconfigured one at Leicester Jct., as part of the Western Corridor Project. Why was this work needed if trains were never to meet/pass Amtrak in this territory?

Again, this is not the way Track Warrants usually work. Much more typical would be for the dispatcher to authorize (for example) the ETHAN ALLEN to proceed from say Middlebury to (for example) the passing track at Charlotte and to wait there for a new Warrant, or to pass an opposing train (for example the Dinner Train).

But how does any of this impact Union Station/Main Street Landing (MSL)--which is beyond the freight yards? Here is where I find this problem to be no justification for building the added passing track at MSL, as long as no freight trains would typically be waiting to enter the yards during the hour or so before Amtrak's expected arrivals. The New England Central RR (NECR)

delivers freight cars to VRS either in the middle of the day or more generally very late at night--both times when Amtrak would NOT be at Union Station even if running quite late. Of course from their perspective it would be ideal to have more "holding/passing tracks" anywhere outside of the yards--but that doesn't in and of itself justify what they propose from King to College. Indeed, a side benefit of building the new 1200 Amtrak siding at the McNeil site is that it also might be used by freight trains waiting to enter the yards during the daytime, when Amtrak would not be present.

If the upgrade on the waterfront is not required by the arrival of Amtrak, then I still fail to understand not only why the taxpayers should pay for it, but also why a new (and of necessity very short) passing track King to College is the choice for added capacity that could much more easily be acquired by, for example, lengthening an existing passing track south of the Burlington yards, or building a new one in a rural setting? If VRS had several miles of true double track between say Shelburne and Middlebury (or Rutland), this would offer much more fluidity than a very short added passing track on the waterfront.

Also and again, what is outlined in Joe Flynn's memo is much more severe than what is usually required for operations over PTC exempted track. VRS was very proud of a GPS based system they had developed to communicate the alignment of the switches at sidings and passing tracks in the absence of full Centralized Traffic Control (CTC) signals and PTC. This was supposed to meet Amtrak's demand for PTC equivalency.

But even if the long track territories outlined in Joe Flynn's letter are imposed by the Feds, the new passing track at MSL is not essential if the freights are not scheduled to stand by outside of the yards (and specifically north of the yards) near the same times as Amtrak would make its brief stops.

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(All opinions expressed are my own)

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## Comments on the Possible Use of the McNeil Plant Site for the ETHAN ALLEN Service Facility

December 17, 2019

Since the last meeting of the Transportation Committee to review the Storage Facility location dispute, VTRANS has identified what may be a very good short-term solution to the Amtrak Burlington Storage Facility issue, the construction of a siding/service track adjacent to the McNeil Power Plant in the semi-rural Intervale area. The Vermont Rail Advisory Council ranked this location Number One and the use of Union station Number Six at its recent meeting.

*This is an enticing idea*—but with the following caveats:

1. ***The McNeil site should be seen only as an interim location.*** The long-deferred Vermont State Rail Plan Priority to repair the full length of the Burlington-Essex Jct. NECR branch line should remain a priority to be addressed as soon as Amtrak service to Burlington actually begins. The new McNeil siding could be used by freight trains once no longer required for Amtrak purposes, or it might serve regional/commuter passenger trains.
2. ***Even if the state ultimately decides to send only one train to Montreal, it is essential to unite the two Vermont passenger rail routes so that ridership can flow from both sides of the state to/from Canada.*** To do this requires the upgrade of the track from Burlington to Essex Jct. to meet passenger service operational standards. Passengers could change trains at Essex Junction or St. Albans to reach points on both Vermont lines. Far better, of course, is direct service over both routes.
3. ***If the McNeil project is built the only work needed at Union Station is to raise at least 300 feet of the existing platform 8 inches above the railhead, to meet ADA rules.***
4. ***It is absolutely essential that if the McNeil service siding is built that the passing track project at Union Station be abandoned.*** If the ETHAN ALLEN train does not block the mainline into the VRS yards, then the situation there will be exactly as it is now—which means that since VRS can currently operate its line with only one track on the waterfront, it will still be able to function with only a single track.
5. ***The inferred threat that the construction of this unneeded second track is somehow a condition of VRS to bring the ETHAN ALLEN and Amtrak to Burlington should be rejected by the city and VTRANS***—which is the true owner of the former Rutland RR mainline used by VRS. If necessary VTRANS should fight this demand all the way to the Federal Railroad Administration (FRA) and/or the Surface Transportation Board (STB).

6. ***The decision to build the McNeil service site and the fate of the waterfront area at Union Station are inseparable.*** The city must express its opposition to the construction of the passing track on the waterfront in unambiguous terms.
7. ***There is a real danger that VTRANS could still approve public funding for the passing track and put the service facility at Union Station.*** There could be a claim that the combined cost of BOTH McNeil and the passing track would be so high that the Amtrak service facility would end up at Union station after all.
8. ***This potential outcome is a trap, which the city must carefully consider before agreeing to support any added rail capacity on the waterfront.*** The McNeil project is estimated to cost at least \$1.5M. The true cost of the Union Station passing track, combined with the needed gates, signals, switches and the bike-path relocation, is likely to reach at least \$2M. Building both doubles costs. But remember, if McNeil service facility is built the passing track is unneeded. This is the key point!
9. ***The public is entitled to much more information as to why VTRANS/VRS persist in contending that no additional capacity can be engineered within the footprint of the current yards or elsewhere on the line south of the waterfront.*** Why have the state and VRS failed to consider other mitigations to address VRS capacity concerns, such as lengthening existing passing tracks south of Burlington, or even building a section of double track in a rural area, to relieve pressure in the yards?
10. ***Neither the city of Burlington, the residents and users of the waterfront area, nor the eventual riders of the ETHAN ALLEN train, should be held hostage to a desire to provide a new siding for VRS to use for its freight and tourist trains, if the Amtrak train is serviced at a location that does not block the mainline on the waterfront.*** It is completely unreasonable to ask the taxpayers to fund a passing track project whose intended need (to allow freight trains to pass the stored Amtrak equipment) no longer exists.
11. ***If Amtrak is serviced in the Intervale at a new McNeil plant siding, it will not in any meaningful way obstruct VRS.*** Total time for the daily station stops at Union Station should not exceed 15 minutes for each of the two daily stops and will probably be less. ***This does not justify funding a multi-million-dollar new passing track with public grants.***

**The idea of servicing Amtrak at the Intervale/McNeill location is excellent as a short-term solution and should be fully developed by VTRANS and endorsed by the city of Burlington.** Of course, this must be done in consultation with the New England Central RR. Time exists to accomplish this project before the Amtrak service can reach Burlington in 2021 (or more likely 2022).