

MaineDOT responses Maine Rail Transit Coalition (MRTC), Critique & Questions provided to MaineDOT by RUAC member Tony Donovan and dated November 20, 2022

Dec 15, 2022

#	MTRC memo page #	RKG report page #	Comment Summary	MaineDOT response
1	2-3	NA	No specific locations for potential future passenger rail stations per FTA funding guidelines related to Capital Improvement Grants	<p>General station areas were used for the economic evaluation based on previous studies. Particular station site selection is a later part of the planning and design process and would be completed after a final alignment is selected. Developments are not part of the project and station design, but evaluated as a consideration of potential economic benefits of the project. With the additional benefit of transit access, the potential for development is higher, and would be specifically done in coordination with local cities.</p> <p>While this RUAC is not part of a Federal CIG process, much of the basis for the passenger rail analysis work in this report comes from the 2019 Lewiston-Auburn Passenger Rail study and the current ongoing L/A Passenger Rail Economic Evaluation. A general assumption MaineDOT makes on large transportation projects such as a passenger rail expansion is that Federal funding will likely be required to complete the capital construction of the project and we proceed in a manner in our planning in compliance with Federal guidelines so as to not disqualify the project from future Federal Funding.</p>
2	2-3	NA	Analysis of economic impacts or ridership for potential future passenger rail must take into account specific locations for the train station or platform to be credible	<p>The evaluation of the economic impact of the restoration of passenger rail service on the Berlin subdivision utilized the ongoing Lewiston-Auburn passenger rail economic study. As noted in the current study, general station areas along the corridor were used while specific parcels were not identified, which is a reasonable approach for this type of high-level planning study. Particular station site selection is a subsequent part of the planning and design process and would be completed after an alignment is selected. With the benefit of transit access, the potential for development would be higher in station areas. Any development in station areas would need to be specifically coordinated with local municipalities. Although private development projects near stations would not be</p>

				part of any passenger rail restoration project, they are evaluated as potential economic benefits of the project.
3	5	3	Lack of sources and citations in RKG report and overemphasis on reports related to trails.	For the level of detail for which the economic analysis portion of the study has been scoped, the number of sources and generalized nature of the citations is appropriate.
4	5	3	RKG report included demographics of trail users but not rail riders	The final summary report removes most references to trail user demographics. Potential users of a passenger rail service were assessed as part of the 2019 Lewiston-Auburn passenger rail study.
5	5	4	Use of passenger estimates from 2019 L/A study is flawed	Use of the passenger rail ridership estimates from the 2019 Lewiston-Auburn passenger rail study is reasonable for this high-level planning study. MaineDOT disagrees that the 2019 L/A study is critically flawed.
6	5	5	The RUAC should meet in a workshop to address issues above	The Council has met on a regular basis. Scheduling of any additional meetings is up to the Council in discussions with the RUAC Chair.
7	6	6	Reports used in the RKG report Appendix include flawed assumptions	Comment noted. See response to comment 3 above.
8	6	7	The RKG report addresses public health issues but does not address climate impacts	Developing a full analysis of economic impacts related to climate change issues is well beyond the scope of the study.
10	6	7-8	Too much data and their sources are questionable and rely on assumptions	Comment noted.
11	6	8	Consider ¾ mile train station radius	Comment noted.
12	6	9	Consultant is not qualified to provide analysis or make judgements about property values (especially using Redfin as a source)	For tracking the general values of residential property values in this type of high-level planning study, Redfin is an appropriate source.
13	7	10	Charts are confusing and BS	Comment noted.
14	7	11	IMPLAN modeling is flawed and not appropriate for this study	IMPLAN is a economic development model commonly used currently by economists for these types of planning studies and economic impact studies.
15	7	11	Study is inflating the data by including snowmobile user spending while ignoring their climate impact	The report makes clear that snowmobile rider spending was included in the analysis and is part of the data set. An evaluation of impacts related to climate change issues is beyond the scope of the study.
16	7-8	12 & 14	ROI analysis must outline the funding sources	Comment noted.
17	7	12	\$274 m passenger rail estimate can be challenged.	Comment noted.
18	8	13	Passenger rail ridership is understated relative to the Portland to Westbrook study	The ridership estimates came from the 2019 L/A study which includes many sources to substantiate its estimates. The ridership estimates from the Westbrook to Portland Conceptual Rail Transit Study are for a rail service on a different rail

				corridor with a significantly different trip length, demographics, congestion, travel time, headways etc. and have nothing to do with ridership on this corridor
19	8	13	Economic impact analysis for passenger rail must determine the train station sites	See response to comment #2 above.
20	8	14	Data source is VHB, while MRTC has provided alternative data for use in the report	Comment noted.
21	8	14	ROI analysis must outline the funding sources	Comment noted.
22	9	15-16	Any passenger rail station near Ocean Gateway in Portland will be more than just a platform	Possibly. The final summary report will refer to the south end of the corridor in the potential passenger rail option as a station.
23	9	15-16	Misc comments about the lack of due diligence by the consultant	Comment noted.
24	9	17	Any reference or data related to Downeaster service is not relevant to the Berlin Subdivision corridor	Comment noted.
25	9	18-20	The section "Other potential benefits of restoration of rail activity" is all qualitative and doesn't quantify them	Comment noted.
26	9	18-20	No reference is made to the Foreign Trade Zone in Auburn	The existing FTZ is in the City of Auburn, whereas the defined RUAC rail corridor runs south of Auburn to Portland, there is no overlap.
27	10	21-22	The Interim Trail Use section should reference the removal of existing railroad infrastructure and these costs should be included in the trail's cost estimate. Study scope does not include reference to STB abandonment.	The final summary report will clarify that the rails, ties, and appurtenances will be removed for the Interim trail option. These costs are already incorporated into the cost estimates. Abandonment is a well-defined process carried out by a common carrier with freight operating rights on a rail line we do not require study or information as part of this scope of work.
28	10	21-22	It is troubling that RKG's findings that imply a large chunk of trail use will be highly education, higher income people	The final summary report removes most references to trail user demographics. Income levels in most of the towns along the corridor are much higher than the state average, which impacts future user demographics.
29	10	23	Assumptions about visitors from outside of the state of Maine are not credible and consultants rely too much on the studies indicated in the RFG report Appendix.	See response to comment #3 above.
30	10	23	Trail related use projections are unacceptable without similar detail re: passenger rail use (similar to VHB's Westbrook study)	Use of the passenger rail ridership estimates from the 2019 Lewiston-Auburn passenger rail study is the basis for passenger rail use, see that report for detail.
31	10	24	References are made about public health impact of trails without anything similar for passenger rail	The final summary report will include reference to the public health benefits of induced walking that is associated with passenger rail transit.

32	11	25-26	One quarter mile from the corridor center line is not enough to capture real estate values	The RKG report states that the analysis zone is ½ mile radius from the rail corridor centerline.
33	11	25-26	Consultant is not a Maine licensed real estate agent and relies too much on on-line sources for data	For this type of high-level planning study, it is reasonable to use available on-line sources for real estate data.
34	11	25-26	The RKG report implies that train use reduces property values	The report clearly states that is the case “in some circumstances” and references only the potential noise and safety impacts from freight service.
35	11	25-26	Consultants should review the 2013 Smart Growth Mobility Project, developed by commercial realtors.	Comment noted.
36	12	27	Inclusion of a map from the 2019 L/A study is confusing	This map is not included in the final summary report
37	12	25-37	The economic analysis must include train station locations (multiple bullets)	See response to comment #1 and #2 above.
38	12	38	Report fails to mention the south end of the corridor is adjacent to Portland OcéanGate (sic) Terminal	The summary report makes reference to the cruise ship terminal at Ocean Gateway, and the Casco Bay ferry that sits ~1/4 mile south
39	12	38	The commuter data taken from the 2019 L/A report is inaccurate since it only looked at the Maine Turnpike and not other commuter routes	In the 2019 L/A report, existing travel within the Study Area was examined to determine the magnitude and type of travel that occurs in order to gauge how many of these existing trips may end up becoming ridership on any Lewiston-Auburn passenger rail service. The Maine Turnpike was only one source of data for the assessment. A variety of data was collected, including traffic volumes, origin-destination data, journey-to-work flows, congestion, travel time and Downeaster ridership data as part of the propensity analysis.
40	12	38	Economic impact of passenger rail should include a quantitative analysis, not just qualitative	Comment noted.
41	12	38	Economic impact must include impacts of “alternative” transportation on climate change	See response to comment #8 above
42	13	38	Any data or lessons learned from Downeaster service is not relevant (inter-city vs inter-urban rail)	Comment noted. Ridership on the Downeaster and other transit provides some relevant information related to propensity of users.
43	13	38	Ridership estimates from the L/A study are not appropriate; VHB’s Westbrook study is more relevant	See response to comment #18 and #30 above.
44	13	41-50	IMPLAN was developed in the 1970’s in Canada and does not take into account climate change, the pandemic and other issues.	See response to comment #14 above.
45	13	51	Reports used in the RKG report Appendix are biased towards trails and not acceptable as references	See response to comment #3 above.

46	16	General	It is confusing for the RUAC to receive conflicting information about multiple corridors being studied by the same consultant; our charge is to make a recommendation for the Berlin Subdivision corridor only	Comment noted.
47	16	General	The Berlin Subdivision corridor study is only taking place because of a misinterpretation that the RR corridor is no longer considered of value for rail use (per the 2019 Lewiston-Auburn study)	Comment noted.
48	17	General	Comments made by Nate Moulton at the October RUAC meeting incorrectly state that determining precise rail station locations would disqualify the state from receiving federal funding for the corridor	Comments made at a meeting are not part of this study, However, see response to comment #1 above related to station sites.