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March 9, 2016

State of Connecticut
General Assembly
Chairman Kennedy, Chairman Albis and fellow members
Committee On Environment

RE: Raised Bill No. 385

The Connecticut Railroad Association (CRA) represents the freight rail industry throughout the state, comprised of one Class I freight railroad and 6 Regional (Class II) and Shortline (Class III) railroads. Together, these railroad members directly employ about 117 individuals and carry nearly 3 million tons of freight over 364 miles of track annually statewide. Our railroads touch a large number of businesses and industries in Connecticut, providing their shipping connection to the North American rail network. The freight railroads operate on a variety of owned, leased from the State of Connecticut, and trackage rights arrangements on Amtrak-owned tracks.

Bill No. 385 contains language the CRA opposes regarding vegetation control on railroad property.

The Federal Railroad Administration has existing Federal regulations that require all railroads operating in the United States to control vegetation along their right of way. These regulations are in place to provide proper drainage, proper clearances for rolling stock, safety for railroad employees and the general public, and allow for sustaining the physical plant (railroad ties, grade crossings, etc.). Railroads currently comply with these regulations by both spraying and cutting vegetation on their property. Railroads utilize licensed vegetation control contractors that also fully comply with these and other regulations.

It is important to note that vegetation control along the railroads is restricted to within the railroad's right of way (track and immediate adjoining land for support and drainage). In general, this is about a 100-foot right of way along the mainlines and auxiliary tracks such as passing sidings and yard tracks. Few changes, if any, occur from year to year for the areas that are covered by railroad vegetation control.

This legislation would place burdensome restrictions on the railroad's vegetation control efforts by requiring multiple advance contacts that would be cumbersome and could cause delays in the vegetation control process. All of the member railroads operate through numerous municipalities, over about 364 miles of track. Weed spray application is done on a seasonal basis in order to be effective. Application dates and areas of application can vary due to weather conditions (such as rain) and railroad operating needs to serve Connecticut businesses. Weed

spraying is generally done by a hi-rail vehicle (a truck with special on track rail wheels that allows it to run on the railroad track as well as over the road).

Shortline railroads make up the majority of rail freight operating companies in Connecticut. Shortlines operate much like small businesses with limited resources due to serving smaller volume rail freight users. The railroads provide very important transportation service to businesses that would otherwise have to rely entirely on truck shipments. These proposed regulations will increase costs to the railroads that could impact limited capital dollars that are required to invest in the railroad infrastructure.

For the reasons and concerns outlined above, the CRA is opposed to this legislation.

Respectfully yours,



Charles D. Hunter
Chairman
Connecticut Railroad Association

Member Railroads:

Central New England Railroad
CSX Transportation
Housatonic Railroad
Naugatuck Railroad
New England Central Railroad
Pan Am Railway
Providence & Worcester Railroad

Connecticut Railroad Association