



## Southeastern Regional Planning & Economic Development District

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January 9, 2009

Mr. Alan Anacheka-Nasemann  
U.S. Army Corps of Engineers  
New England District, Regulatory  
Division  
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696 Virginia Road  
Concord, MA 01742-2751

Secretary Ian Bowles  
Executive Office of Energy and  
Environmental Affairs  
attn.: MEPA Office (Aisling Eglington)  
100 Cambridge Street, Suite 900  
Boston MA 02114

Dear Mr. Anacheka-Nasemann and Secretary Bowles:

The Southeastern Regional Planning and Economic Development District (SRPEDD) is pleased to comment on the Environmental Notification Form for South Coast Rail. SRPEDD has a long history with this project that is summarized below:

### SRPEDD Role in South Coast Rail

The SRPEDD Commission and staff have been actively involved with this project for over two decades and have reviewed several previous environmental reports and feasibility studies that have examined various alternatives for bringing commuter rail to Taunton, Fall River and New Bedford. SRPEDD has consistently supported this project through its various iterations.

SRPEDD has been administering the Southeastern Massachusetts Commuter Rail Task Force since 2000. The Task Force includes a diverse membership of local officials, non-profit organizations representing environmental, economic development, education and other stakeholders in the region. The primary mission of the Task Force has been to promote smart growth and development around the proposed project. The Task Force, chaired by John Bullard, has not engaged in the debate over the pros and cons of different routes.

SRPEDD has also been a contributor to the Smart Growth Corridor Plan and has been involved in working with the cities and towns to identify Priority Development Areas and Priority Protection Areas as measures to address the growth related impacts of this project.

SRPEDD has participated with the South Coast Rail Project to identify potential locations for rail and rapid bus stations. SRPEDD strongly supports the smart growth potential around the proposed rail station sites.

As outlined in its **Regional Land Use Policy Plan**, SRPEDD provides technical assistance, conflict resolution, advocacy, and regional planning services to its twenty-seven member cities and towns. It is not the role of SRPEDD to supersede any local authority, but as the collective voice of the cities and towns in southeastern Massachusetts SRPEDD has an obligation to speak out on issues of regional importance. In undertaking our review of the South Coast Rail Project, SRPEDD has consulted other documents developed with our communities including, the **Regional Transportation Plan** and the **Comprehensive Economic Development Strategy (CEDS)**. SRPEDD has also remained committed to the Commonwealth's Sustainable Development Principles in undertaking this regional project review.

### General Comments

The Southeastern Regional Planning and Economic Development District (SRPEDD) has been actively involved with the proposed restoration of commuter rail service between Boston and Fall River/New Bedford for two decades. During that time, SRPEDD has undertaken technical analyses and developed policy positions related to this project.

SRPEDD's review of this Environmental Notification Form is based upon objective professional analysis and upon regional plans, policy positions and public statements of SRPEDD. These are noted below:

SRPEDD strongly supports the South Coast Rail Project and has been on record supporting the restoration of rail service to the South Coast since the mid-1990s.

SRPEDD supports the decision of EOT to go forward with only three alternatives (Stoughton, Middleborough Simple and Rapid Bus) and to drop the others from further consideration. The evidence presented by EOT supports that decision and is confirmed by our own technical analysis.

SRPEDD supports the eventual restoration of service to Wareham and Cape Cod and we are concerned that the proposed Middleborough Simple alternative would preclude future service to those destinations. We request that this factor be considered in your analysis.

SRPEDD supports a process for mitigation of negative environmental impacts that addresses the need for equity among the region's cities and towns, considers regional as well as local mitigation measures, and evaluates net environmental benefits to the region from mitigation actions.

SRPEDD believes that consideration of the final options in the EIR/EIS should include the possibility of additional rail service [light rail or trolley?] connecting Fall River, New Bedford and Taunton to each other and operated in a coordinated fashion with the proposed MBTA rail service connecting the three cities to Boston.

SRPEDD is the staff of the Southeastern Massachusetts Metropolitan Planning Organization (MPO), and in that capacity has been advocating for improvements to Route 24 to accommodate existing and projected traffic, regardless of the rail project. SRPEDD's analysis of the Rapid Bus option was conducted in the context of also meeting the highway improvement recommendations that are included in SRPEDD's 2007 Regional Transportation Plan.

We urge that this project be evaluated by all regulatory agencies on the **overall impact** to the southeastern Massachusetts region, including the areas of transportation, urban revitalization, environment, air quality, smart growth and economic development. We request that the project be judged in its entirety and that negative impacts be balanced against positive impacts associated with the project.

The scope should include a look at the cumulative effects on air quality and impacts on water resources with and without the project. In other words, describe the growth scenarios with each alternative, including no-build. Using the project's energy and economic development stimulus to affect the style and location of development rather than letting it happen piecemeal will have positive impacts that need to be considered in evaluation of the project.

#### Project Need/Demand

The "latent demand for transit (the number of daily work trips from the South Coast region to Boston), based on U.S. Census 2000 Journey-to-Work data" presented on page 2-4 paragraph 2, "is approximately 8,000". We believe that this number is grossly underestimated. Based on our calculations for trips from the SRPEDD communities identified as needing transit service to Boston, there were 11,377 work trips to Boston (defined as the greater Boston area served by the 'T' system) in 1990. That number rose to 15,153 in year 2000. We are concerned about underestimating the existing demand, which will dramatically increase if commuter rail is available.

Table 5-23 displays years 1990 and 2000 work trips to Boston originating in south coast communities. Based on 1990 and 2000 U.S. Census Journey to Work data for trips to Boston/Cambridge, CTPS has calculated 5,856 trips in 1990 and 8,063 trips in 2000. As noted above, we do not agree with the numbers presented. SRPEDD estimates 11,377 trips in 1990 and 15,153 in 2000 are potential customers for this service. These numbers, also from U.S. Census Journey to Work data, represent work trips to greater Boston which we assume to include communities in greater Boston that are accessible from the T system. There is considerably more existing demand for trips to Boston than Table 5-23 presents.

We believe that the traffic growth rates are higher than those presented in Table 2-1 on page 2-8. For example: total traffic growth on I-495 south of Route 140 in Mansfield was calculated at 46.0%. Based upon our recalculations, it is actually 86%. The annual growth rate at the same location was presented as 5.2% but we believe that it is 7.2%.

The footnote at the bottom of page 2-15 states that “according to Central Transportation Planning Staff (CTPS), most commuter rail customers live within a 6 to 8 mile radius of a commuter rail station” and that “this distance is generally used for estimating ridership”. This does not account for commuters living a greater distance from a station, but having the station located along their normal route to Boston. SRPEDD’s survey of ridership at the Lakeville MBTA station in May, 2008 show over 40% of riders coming from more than 8 miles from the station. The Fall River station is also likely to attract riders from outside MA, including commuters from Tiverton, Little Compton, Bristol, Warren, and Newport County, Rhode Island. These commuters should be included in ridership estimates.

We also request that the EIR/EIS address how the fluctuations in the price of gasoline are factored into the ridership projections.

SRPEDD requests that the evaluation of alternative routes needs to include access to job markets that exist at station sites between the SouthCoast and Boston. Each possible train route opens up access to employment opportunities for Southeastern Massachusetts residents that are currently difficult to reach via the highway system. For example, the Stoughton alternative would provide better access to significant employment areas in Taunton, Easton, Stoughton, Canton and Westwood. The rail stations at Hyde Park and Back Bay also add employment possibilities that are currently remote for South Coast workers.

#### Route 24/Bus Rapid Transit Alternative

Within the “Summary of Common Reasons for Rejecting Phase 1 Alternatives” on page 3-11, is a discussion of the disadvantages of constructing commuter rail along the Route 24 corridor. The disadvantages include: a wider footprint for Route 24 which would impact the Hockomock Swamp ACEC and private homes, involve bridge replacements and extensive modifications to most of the highway interchanges, and ultimately would preclude future expansion of the Route 24 corridor. Adding a high speed bus lane would have similar adverse impacts. Both SRPEDD and OCPC have concluded in their Regional Transportation Plans that a wider Route 24 layout (added lane in each direction) is already needed regardless of the availability of commuter rail/bus to Boston.

Chapter 4 defines the Rapid Bus Alternative. On page 4-55, the ENF states that “a new travel lane is required in each direction along Route 24 between the Route 140 interchange and the I-495 interchange”. The widening of Route 24 has already been identified as an existing need simply to handle current traffic demands from commuters to Boston and the I-495 and I-95 job centers, and to handle trips to nearby industrial uses and adjacent regional shopping destinations.

Chapter 4 goes on to state that some form of new exclusive bus lane in the median or zipper lane on off-peak travel lane would begin at I-495, extending to the I-93/Route 128 interchange, and then along I-93/Route 128, ultimately connecting to the existing zipper lane on the Southeast Expressway. The extra width necessary to construct an exclusive bus lane could eliminate any possibility of a further widening of the corridor.

The expense for land takings immediately surrounding the interchanges must be factored into the cost estimated for the Rapid Bus option. Many of the takings are likely to be very expensive and potentially very difficult due to the value and demand for land immediately adjacent to interchanges along such an important heavily traveled (Route 24) corridor. Planning for improvements to the connecting corridors (such as Routes 44, 106, 123, etc.) must also be calculated into this alternative. There are potentially far reaching traffic congestion and safety issues that must be addressed in the vicinity of each interchange, including corridor widening, access management improvements, and traffic control coordination.

Table 4-14 concludes within the “constructability” issue, that the majority of construction will not significantly impact existing traffic under Alternative 5 - Rapid Bus. It also concludes that schedule risk is minimal. We believe that the impacts will be greater than stated. Construction along the Route 24 mainline will severely impact traffic flow throughout the construction period at each bridge and interchange, and all along the corridor. Construction will extend peak period congestion to much longer periods on the day. Commuter periods will likely be gridlocked. The timeline for this alternative is likely to be threatened by difficult and costly land takings primarily in the vicinity of each interchange and bridge project.

Regarding the Rapid Bus alternative, page 6-15 states that “the majority of construction activities for this alternative would occur within the Massachusetts Highway Department rights-of-way along segments of Route 24 and Route 128/I-93.” This apparently contributes to the conclusion that Rapid Bus would have the lowest cost of all alternatives considered. We do not agree with this conclusion. There is no discussion of the fact that most of the existing highway interchanges currently have serious design issues.

In 1998 the Massachusetts Highway Department prepared a cost estimate for the potential conversion of Route 24 into an Interstate Highway. This analysis was conducted at the request of the SMMPO, and involved an identification of the physical deficiencies of Route 24 that did not meet current federal highway design standards. The Interstate Conversion Study and Cost Estimate calculated a total cost for the entire length of Route 24 at \$199,000,000. It involved major upgrades to eleven interchanges, minor upgrades to another six interchanges, reconstructing 27 underpass bridges, drainage modification, signage, design and right-of-way acquisitions. The Study did not include a lane addition and stated in its cover letter that “Additional engineering, traffic and environmental studies are required to further evaluate facility improvements, and to address other design deficiencies not necessarily related to Interstate Highway standards.” In the ten years since the cost estimate, construction costs have more than tripled, which would place the cost for these improvements at more than \$600,000,000.

The ENF does not recognize the significant interchange improvements/modifications (and land takings to accommodate them) that would be needed to provide the necessary infrastructure for bus lanes, and provide appropriate design standards for each interchange and adjacent intersection operations. The EIR must provide a realistic

estimate of the considerable costs associated with making each of the highway interchanges comply with appropriate design standards. SRPEDD believes that the Rapid Bus alternative should require that all of Route 24's physical deficiencies be addressed as part of the preparation of the zipper lane.

Overall, we believe that the rapid bus alternative is a more expensive and more disruptive option than the ENF states. We are concerned about the compatibility of this option with plans that are being pursued to make improvements to Route 24, and taken together, the planned Route 24 improvements and the bus rapid transit option could result in the need to widen the ROW through the sensitive Hockomock Swamp area more than is stated in the ENF.

#### Air Quality

There will undoubtedly be a significant improvement in air quality resulting from this project. The mesoscale analysis must consider all elements of mode shift. That includes the likelihood that there would be a greater mode shift to commuter rail over the rapid bus alternative, and therefore, a greater emissions reduction for the rail options. Several studies nationwide have shown that commuter bus generates a far smaller mode shift compared to commuter rail.

The air quality impact analysis should factor in the vehicle trips that will be eliminated or reduced under different alternatives. If possible, this analysis should not only include the commuting trips that are eliminated by commuter rail or bus passengers who switch from single occupancy vehicle trips, but also should consider the trips that could be eliminated by the promotion of transit oriented development and the elimination of midday errands that are undertaken on foot or transit by commuter rail/bus passengers.

#### Environmental Justice

New Bedford, Fall River and Taunton are the only cities within 50 miles of Boston not served by commuter rail. Over 57% of Fall River's population and over 68% of New Bedford's population is living within designated Environmental Justice (EJ) areas and the surrounding communities of Dartmouth, Fairhaven, Taunton and Swansea also include EJ populations.

Although the Environmental Justice policy of the Executive Office of Energy and Environmental Affairs defines EJ populations as neighborhoods, it is our contention that the entire South Coast qualifies as an EJ area and that the lack of passenger rail service has been a significant factor in that determination. We request that the level of service be weighed heavily during the evaluation of alternatives because we suggest that environmental justice considerations require that the South Coast region be provided with a level of service that is equivalent to the rest of the MBTA system.

#### Resource Impacts

Accurate and easily understood site maps depicting the land uses and resources areas impacted by, and adjacent to, the proposed project must be included in the EIR/EIS.

These maps should illustrate the probability of impact on sensitive receptors in the natural and built communities as well as on protected resources.

The EIR/EIS should describe any cultural, historic, or archaeological resources located in the immediate vicinity of the proposed project and the potential impact of the project on the resource. Resources such as Heritage Landscapes, areas/sites significant to the Native Peoples (both physically and spiritually; such as Peace Haven, the Acushnet Cedar Swamp, etc.) should also be included in this review. Consultation with Tribal Councils, local Historical Societies and Commissions, and regional entities should occur in conjunction with state and federal historic review.

Noise and vibration can impact the built and natural environment in a number of ways. Where the proposed project involves new or relocated steel rails, the proponent should compare the distance between the center of the proposed project and the nearest noise/vibration receptor to the screening distance for this type of project per the FTA's guidelines. If the screening distance is not or cannot be achieved within the current project alignments, a "General Vibration Assessment" and "General Noise Assessment", with conclusions, should be completed. These assessments would also involve subsurface and soils analyses and be extremely important in sensitive habitat areas as well as the more urbanized areas where dwelling units are located in close proximity to proposed and existing rails.

A thorough description and maps of the project's potential impacts on on-site and adjacent wetlands, particularly regarding function and systemic relationships, must be included in the EIR/EIS. Comments from the NH&ESP, DEP, and the ACEC Program should be evaluated in a coordinated manner, particularly where the retention and function of intact ecosystems are an issue (and all three agencies have jurisdictional/protected values concerns).

A thorough description and maps of potential impacts to floodplain areas should also be included in the EIR/EIS. The analysis should address possible flooding induced by the proposed project due to the taking of any floodplain capacity.

The EIR/EIS should address the importance and value of the Atlantic White Cedar in the Hockomock and Assonet Cedar Swamps as a natural community, its historic and archeological uniqueness, its role in flood and pollution retention, and how it will be measured and mitigated. The restriction of hydrologic flow caused by the existing railbeds should be evaluated to determine if it is beneficial or harmful to the Atlantic White Cedar, and mitigation proposed accordingly. It is further noted that a study of rare species study completed in 2001 was conducted during drought conditions, which may have influenced the findings.

The ENF considers activity in the "Southern Triangle" as having no additional or direct impacts to state listed species, wetlands, vegetation or wildlife and historic or archeological sites due to active rail. Construction or reconstruction that will occur within the rail right-of-way will be subject to stormwater runoff, soil disturbance, noise, and

impacts related to the replacement of rail, culverts and bridges. Impacts to areas from the Southern Triangle should be addressed in the EIR/EIS.

The project proponent should offer opportunities to improve vegetation management in the rights-of-way through specialized training and tagging of sensitive areas. This added step is paramount to the protection of our water resources for human consumption.

The Town of Freetown has recently identified a water resource on South Main Street within close proximity to the rail. Currently it is being utilized as a filtration system but the community has identified it as a groundwater resource.

### Transit Interface

The location and design planning for stations should consider transit and pedestrian access for safe, accessible bus pickup and dropoff. How transit vehicles will approach the stations on local roads should be considered. Station area design should allow transit vehicles, shuttles and pedestrians easy access to the platform or bus station, minimizing travel through parking areas and conflicts with automobiles entering and exiting parking areas. Rail station design should also consider the possibility of service by larger intercity buses to allow commuters to make their trips by rail in one direction and by bus in the other direction, allowing more options and increasing the overall use of transit.

Regional transit service is currently inadequate. The EIR/EIS should outline necessary improvements to regional transit service, in consultation with the Regional Transit Authorities, in order to adequately serve the new stations. The ability of local bus service to transport commuters to the project stations will minimize local VMT and the need for parking.

The GATRA information needs to be updated to include new service areas and routes. There is no more Interstate Bus service from Middleborough or West Bridgewater. Commuter bus fares have increased. Park and ride space for commuter bus at Silver City Galleria has grown above capacity, according to Dattco, Inc. Information on three private park and ride lots in the South Coast also needs to be updated.

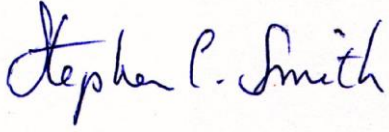
### Conclusions

We wish to re-emphasize our support for EOT's recommendations that the final scope include only three alternatives (Stoughton, Middleborough Simple and Rapid Bus) and that the other options be dropped from further consideration. We agree with EOT that the Attleboro alternative has too many operational, budgetary, scheduling and environmental obstacles, and that the full Middleborough option will require too much work in the Quincy/Boston area to make this alternative practicable. We further wish to reiterate our concerns that the rapid bus option presents potential conflicts with plans for upgrading Route 24 and that the costs will be much higher than estimates in the ENF.

The Commission and staff of Southeastern Regional Planning and Economic Development District remain committed to this project and we would be happy to

elaborate on any of the comments made in this letter. Please do not hesitate to contact Stephen C. Smith, Executive Director of SRPEDD if you have any questions.

Sincerely,

A handwritten signature in blue ink that reads "Stephen C. Smith". The signature is written in a cursive style with a clear, legible font.

*for*

Susan B. Peterson, Chair  
SRPEDD Commission

Cc: SRPEDD Commission  
Southeastern Massachusetts Commuter Rail Task Force  
Mayors and Boards of Selectmen  
Federal and State Legislators  
Massachusetts Executive Office of Transportation  
Massachusetts Executive Office of Energy and Environmental Affairs  
Massachusetts department of Environmental Protection  
U.S Environmental Protection Agency