

Secretary Ian Bowles, EEA,
attn.: MEPA Office (Aisling Eglington)
100 Cambridge Street, Suite 900,
Boston, MA 02114

1261 West Street
Stoughton, MA 02072
15 March, 2009

Alan Anacheka-Nasemann,
US Army Corps of Engineers, New England
District,
696 Virginia Road,
Concord, MA 01742-2751

Dear Secretary Bowles and Mr. Anacheka-Nasemann:

I write again in opposition to the South Coast Rail (SCR) project. These comments debunk this proposal and show the extravagant waste of public funds to support a political promise. Let us not lose sight of the principal project purpose – to transport people from Fall River and New Bedford to Boston. There is a lot of slight of hand to distract attention – but why propose a rail line if not for this principal purpose?

I apologize to those readers who do not have the Supplemental Ridership Memorandum of 13 February and the undated corrected table #1 in front of them to follow this discussion. It would be too ponderous a letter to repeat the material in those documents. The addressees have this material.

I sent comments on the initial ENF for the South Coast Rail on 7 January 2009. I will not repeat those comments except to say that the train represents a nineteenth century solution to a 21st century problem. In the nineteenth century, the train was competing with the horse and wagon and was a welcome convenience and truly great advance in transportation technology. In our 21st century, the train is competing with cars and trucks, and is neither more convenient, nor an advance in technology. You know that 21st century people in the USA are used to being able to come and go as they choose, defining their own schedule. Most people have responsibilities at home as well as work and have built their lives around their ability to juggle their many responsibilities. I have two married daughters with young children and see firsthand how each parent has to be able to react to the requirements to pick up a sick child at school, to adjust their work schedules to meet the needs of their children to get to “practice”, etc. The train does not allow this kind of flexibility, thus it is a poor competitor in the transportation realm. You will see the effect of this reality if you are willing to take an honest look at the traveler numbers shown in the supplemental ENF. These numbers show that there are fewer than 3000 new riders per day that will use any of the train or bus options proposed and of these approximately 3000 new riders, about 1500 will come from those people taking private bus service who will switch to a SCR option (see the attached email communications with Scott Peterson, CTPS planning modeler for the SCR project).

Let me remind you that the proposed project cost is \$1.4 billion. **The numbers I will present to you indicate that the Governor is willing to spend about \$1 million (\$1,000,000) per new public transportation rider.** To do this, he wants to devote over 10% of his proposed gas tax increase to this project.

I would point out that I am on the MAPC legislative committee, and last month argued strongly that the gas tax needed a greater increase than the Governor proposed because of the deplorable state of our transportation system and because Massachusetts must have a first class transportation system if it is to be economically competitive and provide economic opportunity for its citizens. There were others on the committee who wisely said, ‘people distrust the government to spend their tax money wisely and because of this distrust, they do not want their

taxes increased'. As Billy Joel noted, it really is just a matter of trust. And this South Coast Rail project just doesn't measure up on the trust scale.

Table 2 of the Supplemental ENF filed on February 17 shows the "Daily Linked Trips" for various transportation alternatives. A linked trip is a person traveling from point A to point B. There is a separate linked trip for that same person to get from point B back to point A. So for a commuter traveling to Boston (point B) from Fall River, New Bedford or Taunton (points A in this analysis), this would constitute 2 linked trips. And from the email communication with Scott Peterson (referenced above) about 1500 riders (3000 linked trips) are from people leaving the private bus services and choosing one of these public options instead. If we look at table 2 from the perspective of accounting for the definition of linked trips and transfer of riders from private bus to one of the SCR options noted above we would see the new public transit ridership the SCR proposals will attract for the \$1.4 billion dollar expense.

TABLE 2: Daily new public transit riders (not those switching from current regional or private bus service) to and from Boston because of building one of the following options

OPTION	Attleboro diesel	Attleboro electric	Middleboro full build	Middlebor o simple	Stoughton diesel	Stoughton electric	Rapid Bus
# New public transit riders	850	1350	950	700	1000	1450	250

The highest number of new riders in this table is 1,450. The project cost of \$1.4 billion represents about \$1 million (\$1,000,000) per new rider. It is disheartening to me that a Governor, who showed such great promise, would be as cavalier with the use of your money as a taxpayer and mine.

But that is not all. The project is being "sold" as an economic stimulus. At the most recent South Coast Rail Task Force meeting, Secretary of Transportation Alioto indicated that the bus route was not an acceptable alternative. It wouldn't provide the promise the Governor made to the South Coast elected officials. It would not generate the kind of economic regeneration of an area around a bus station that would occur around a train station. And at the same meeting, the South Coast Rail project manager, Kristina Egan said, there would be no tunnels or depressed rail as there was in the Greenbush project; the cost would be too great. The other "selling point" is that the train will reduce vehicle miles traveled, and thus reduce air pollution.

Let's look a little deeper into each of these claims.

Remember the principal project purpose - people need to get to Boston quickly from Fall River& New Bedford and the area needs economic stimulus. From the corrected "Service Assumptions" Table 1, the High Speed Bus is faster by about 9 minutes (12%) than the fastest train option. The cost for the bus option is about \$0.5 Billion – the remainder of the \$1.4 billion project cost could be used as a stimulus in the Downtown areas of FR/NB. This is not acceptable to the administration. The Governor indicates - a train is the answer.

Let's look a little deeper into the environmental benefit claim - clean air as the environmental benefit from the project - versus destruction of a large portion of a wetland that is an Area of Critical Environmental Concern. Table 5 of the Supplemental ENF entitled "Changes in Peak Period VMT" (note VMT means vehicle miles traveled) shows a total VMT in 2030 of 57,916,400. The reduction in VMT for the Stoughton and the Attleboro alternatives are roughly the same. The Stoughton alternative shows a VMT reduction from the no build option of 241,900. That is a VMT reduction of 0.418%. Remember at the outset, I said that the train was not competitive with the car. Attracting less than 1500 people and reducing the pollution level from auto traffic from this project by less than a half percent isn't something that dreams are built on. At the same time, this project (if the Stoughton Route is chosen) will pass

through miles of the Hockomock Swamp and destroy a large portion of a shaded wetland, the most productive kind. This will be a tangible and irreplaceable effect. The small reduction in VMT can be obtained through many other, less destructive governmental actions. What environmental analyst would make the tradeoff between a real and irretrievable loss of an ACEC wetland and a small VMT reduction that could be obtained in many ways?

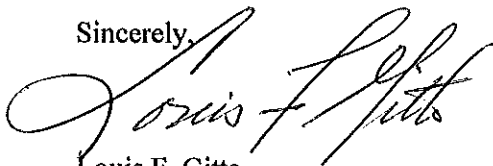
Let's examine the notion that depressing the rail bed in Stoughton would be too costly (if that route is chosen). It seems that there is no concern with the costly use of taxpayer money to satisfy a political promise. It is equally outrageous that the Governor would have callous disregard to the effect that the decision would have on an entire community of 28,000 people. Stoughton has 9 grade crossings, 4 of which are within 0.3 of a mile and in the center of town. The downtown is notorious for its traffic problems, even without the through-train. If the Governor can spend a million dollars per new public transit rider from the FR/NB area, then as a matter of equity – which is a reason for promoting this rail line – he could spend (tongue in cheek) \$28 billion on Stoughton – quite a stimulus indeed. But more realistically, the cost of depressing the line should be the cost of doing business. **“The creation of new at-grade crossings is not a preferred approach to addressing highway mobility.”** This quote is from the Railroad-Highway Grade Crossing Handbook - Revised Second Edition August 2007 by US Department of Transportation Federal Highway Administration. How could the Executive Office of Transportation not know this? The line will be in place forever and will adversely affect the town. To not only dismiss the notion out of hand, but to not have decided to depress the rail line when creating the original design shows how little caring the administration has for the citizens it should be protecting.

As a Stoughton citizen, Stoughton's representative to the South Coast Rail Task Force, someone who has spent extensive time in government at the local, state and federal levels, and a person who has devoted his entire working career to environmental protection, I am extremely disappointed in the disdain of the Administration for the environment, the use of taxpayer's dollars, and the lack of concern for the impact on the Town of Stoughton if this train route is chosen. From the items noted above, any route would be irresponsible, but the Stoughton Route is particularly egregious.

Secretary Alioto indicated at the SCR meeting on Wednesday, 11 March, in Taunton that the administration would listen to the will of the elected State Senators and Representatives and to the Mayors and other elected officials in making its determination of the rail route to be chosen. I believe this to be true. That is precisely why there is another branch of government where the people can be heard. If the Stoughton route is chosen, the train through Stoughton should be depressed to avoid the safety and traffic concerns.

Thank you for your careful attention to these comments and for allowing me the opportunity to participate in the process.

Sincerely,



Louis F. Gitto
Stoughton Representative to the SCR Task Force
Town Meeting Representative and
Former Selectman

Attachment: 10 March 2009 - Email exchange between Lou Gitto and Scott Peterson.

Attachment: 10 March 2009 - Email exchange between Lou Gitto and Scott Peterson.

From: Scott Peterson [mailto:scottp@ctps.org]
Sent: Tuesday, March 10, 2009 10:49 AM
To: Gitto, Lou (DEP)
Cc: Egan, Kristina (EOT)
Subject: Re: SCR - Questions re your 2/13/09 Report

Hello Lou,

In response to your questions:

1) A linked transit trip is a trip produced in one TAZ and attracted to another TAZ, regardless of the number of transit modes they take.

An example: If there are 4,700 new linked transit trips for the Attleboro Local Diesel option, for simplicity that could mean 2,350 trips from peoples homes in the SCR study area destined to work in Boston (although their destinations could be other locations) and then 2,350 homebound linked transit trips, with no intermediate stops, just transfers between other transit modes if they were needed to get to their destination.

2) Boardings are counted for each transit mode a person gets on. You are correct in the example you gave, one linked transit trip could have 1 commuter boarding and 1 subway boarding (2 total) to get to their destination. On the homebound trip, it would be the same in reverse. So that would translate into 1 person commuting daily, making 2 daily linked transit trips, accounting for 4 daily boardings on the transit system.

The private bus ridership does get reduced in all of the alternatives to varying degrees. The Bus Rapid Transit option has the existing private buses in the background and their ridership is small.

3) The private bus ridership in the No-build/TSM is about 4,000 boardings daily (2000 in/2000 out). All of the build alternatives have a scaled back private bus service running similar to today's service. In all of the alternatives except the Middleboro options, the private bus ridership goes down to around 500 (plus or minus a few hundred). The Middleboro Full build option has about 500 hundred more private bus riders than the other options and the Simple option has around 2,000 private bus riders.

Hope this helps, let me know if you have any more questions.

Scott

----- Original Message -----

From: Gitto, Lou (DEP)
To: Scott Peterson
Sent: Tuesday, March 10, 2009 7:05 AM
Subject: SCR - Questions re your 2/13/09 Report

Scott,

Here are my initial questions regarding the material in your 2/13/09 report to South Coast Rail Project Manager Kristina Egan..

1. I am confused over the definition of "Daily linked Trips" in Table 2.

o Is a single linked trip a one-way trip to Boston (and other side trips), with the home-bound trip counted as a second trip?

o Or is the round-trip (home to Boston to home ... with intervening stops) one linked trip?

2. I am confused over the definition of "Boardings by Mode" in Table 3.

o Is a "boarding by mode" an event where a person gets on a train as part of a trip to go to work – and if she then gets on a subway is that a second boarding on the same trip? And if the process is repeated in reverse (subway to train to home) does the round-trip consist of 4 boardings? I notice that you only are counting the train and rapid bus boardings, so you are not getting into the details of a trip.

o In this table you show the rapid bus boardings of 6,800. Have you determined if these boardings reduce the boardings for the private bus service? And do the trains decrease the private bus service trips as well – and to a greater or lesser degree?

3. In Table 5 I presume that the "no build option" includes private bus service. In the other options, has (some or all of) that service been switched to the trains? If so how much? If not, why not?