

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

1261 West Street
Stoughton, MA 02072
January 7, 2009

Re: Comments Re South Coast Rail Project NAE-2007-00698

Dear Mr. Anacheka-Nasemann,

I write in opposition to the selection of the Stoughton Route and offer several alternative routes that are less environmentally harmful and provide better service to the South Coast and Southeastern Massachusetts in the longer run, when considering projects to solve needed train service upgrades for the State and AMTRAK. I purposely say “in the longer run”, because the South Coast Rail (SCR) project should not be looked at as an isolated decision when pitted against environmental resources that, once lost will not be regained. I believe that “the longer run” decision making is likely to be about 2 to 8 years from now, not 50 to 100 years away.

AMTRAK is now engaged in a planning process that will have to solve the capacity problem from Boston to Providence by putting in another track in at least the same area that SCR recognizes will need to be upgraded. And along the Middleboro route, the Quincy bottleneck – created by poor State Transportation planning – must be broken in order to solve the need for the increase in service if ridership on the three existing routes south of the bottleneck (Middleboro, Plymouth and Greenbush) comes to fruition and if service to Wareham and the Cape is added¹. Note that solving either the AMTRAK or the Quincy bottleneck will provide service to Fall River and New Bedford (FR/NB) and either will serve a much greater total population than the Stoughton Route. My estimate for breaking the bottleneck in Quincy is that a population of about 1.2 million people (the South Shore, Cape and FR/NB) would have adequate service. I have not estimated the population served by the commuter system along the AMTRAK route (Providence, Needham, Forge Park, Stoughton, and FR/NB), but it is comparably to the South Shore, the Cape and FR/NB. By comparison, the Stoughton Route would serve a population of about 400,000, including FR/NB.

PROJECT PURPOSE AND THE LEDPA

Project Purpose

There appear to be conflicting project purposes between the US Army Corps of Engineers (the Corps) and The Massachusetts Executive Office of Transportation (EOT).

The Corps’ purpose: to more fully meet the current and future demand for public transportation between Fall River/New Bedford and Boston, Massachusetts.

The Mass EOT purpose: to more fully meet the current and future demand for public transportation between Fall River/New Bedford and Boston, Massachusetts to enhance regional mobility, while supporting smart growth planning and development strategies in affected communities.

¹ Note that the Middleboro line is already over current capacity according to the SCR ENF (see page 4-18, table 4-3 “Ridership on Providence, Stoughton and Middleboro Lines”).

I was/am a member of the Vision 2020 Task Force² and support the concept of “smart growth planning and development strategies” that were proposed many years ago when then Secretary of Environmental Affairs, Robert Durand, helped to establish the “Section 418” development process, that provided aid to all communities to evaluate their “build out” potential under their then-current zoning and assisted them in implement different zoning strategies so communities could develop in ways that took account of existing and proposed infrastructure, and protect areas that should not be developed. The smart growth concept is (a) not new, (b) not dependent on the South Coast Rail Project for it to be implemented, and (c) not assured to be implemented if the SCR project is developed.

Smart Growth and Green Project are terms that have been liberally sprinkled throughout the written and verbal SCR project description. As I indicate, I favor Smart Growth. Furthermore, prior to retiring from Federal Service I had been the Air Pesticides and Toxics Division Director of EPA Region 1 (New England Region) for several years, and appreciate the importance of green projects, which use resources wisely and work to reduce greenhouse gas emissions. When I spoke briefly at the Public Hearing in Taunton on 12/3/08, I cautioned that while smart growth and green projects are important concepts, evaluating the environmental impact of the projects relative to these terms and relative to the overall environmental burden must be carefully done³.

The Least Environmentally Damaging Practicable Alternative

It is clear that the current data from the SCR evaluation would score the Rapid Bus Option and any project through Middleboro as less environmentally damaging than the Stoughton Alternative. The question is, are these options “practicable”.

Practicability is defined by EOT as

- Able to be completed by 2016
- Costing at or below \$1.4 Billion
- Travel time less than 90 minutes (all routes meet this criterion)

I will come back to these criteria in a moment to show that they may not be appropriate for making choices that forever affect an environmental resource, when it is clear that this and subsequent longer-term and necessary transportation projects cumulatively will create greater environmental harm if not properly chosen as a package.

Rapid Bus

If practicable means can they work, then let us remember that there are three existing bus lines currently operating without a dedicated lane for HOV/Bus service⁴. It would seem that by increasing the ability for these buses to travel in a dedicated lane during rush hours there would

² See SERPDD web site:

³ From what I have seen and read, the terms smart growth and green project have been used for this SCR project as an advertisement, rather than in a rigorous scientific manner. If the terms are to have credibility in an alternatives analysis, they must be evaluated as to impact on health and the environment and not evaluated just in terms like tons or pounds of pollutants removed from the air and water.

⁴ DATTCO to New Bedford, Peter Pan Bus Lines to Fall River and Bloom Bus Lines to Taunton (see ENF document 4-19)

be (a) more incentives for people to use bus service (because the trip times would be even shorter – note bus travel is the fastest option in this ENF) and (b) it is possible for buses to establish many destination (or pick-up) points within Boston and within the cities of FR/NB and Taunton. In other words, Bus Service is a much more flexible (and easily expandable) system⁵ to meet changing customer demand than a train. [And although not part of the option, what if Boston created some exclusive Bus and Taxi corridors; that act would only enhance the flexibility of this system.] The ENF states that the intent is to upgrade these buses to state of the art, with wireless connections, better seating, more capacity for getting on and off quickly, etc. So for a fraction of the cost of a train, there is a system that can provide to travel customers faster and more flexible service than the train – and it appears to be the second least environmentally damaging alternative (the Middleboro route may be least environmentally damaging). And this system does not seem to preclude intra-regional service (regional mobility) as the demand develops. **From a LEDPA perspective, the Rapid Bus Option would seem to be hard to reject.** But we should go on to review some other options.

Keep the Attleboro and the Full Middleboro Options in the Final Analysis

I indicated that it is necessary to return to the criteria that EOT used to define practicability to choose its options. Let me repeat them here.

- Able to be completed by 2016⁶
- Costing at or below \$1.4 Billion⁷
- Travel time less than 90 minutes (all routes meet this criterion)

Thank you for directing your attention to footnotes 6 & 7 below. Can we for just a moment suspend judgment and think about these criteria in a slightly different way.

What improved transportation could be provided within the 2016 EOT imposed timeframe and then what system could/would be in place by 2020 to supplement that system to create an end product that would be better than what was initially contemplated.

For example, the Rapid Bus Option could be a short-term low cost, low environmental impact solution. The remaining EOT allowed project cost (\$1.4 billion minus about \$0.45 billion) could be shared with AMTRAK to upgrade the required service on the AMTRAK line and connect to the upgraded AMTRAK line using the Attleboro Route. Make no mistake; the additional AMTRAK track will be a required improvement that will be built **for service and safety reasons to support a nation-wide system.** Under the current climate for infrastructure improvement, the decision to make this improvement will come soon. Those AMTRAK public costs and environmental costs will be a reality – most probably well within the 2020 timeframe. It is just a matter of who pays for the project. If the State and Federal monies are combined, the total cost will be less and the

⁵ For more thoughts on “flexibility” see CD file “**Just for fun, let’s design a year 2000 transportation system**”

⁶ A project should still be practicable, even though it cannot be completed by 2016. There may be “work-a-rounds” that make these options viable.

⁷ A project should still be practicable even if above an expected budget, because we could look at project cost in terms of cost/benefit – e.g., more people served per unit cost and couple that analysis with shorter-term viable “work-a-rounds” noted in the above footnote.

total environmental impact will be less than building the Stoughton Alternative and then building the AMTRAK expansion separately. In addition to FR/NB, the total Massachusetts population served will be much greater⁸. And the Rapid Bus Option will still be available for bus and HOV service that can provide more service flexibility and regional mobility than the train alone.

Can we close our eyes to the need to break the rail bottleneck in Quincy? The single rail running through that bottleneck serves the South Shore with a very large commuter population to Boston at the present time and must deal with ridership growth, is planned to be used to expand service to Wareham and Cape Cod, and will certainly serve a casino in Middleboro and the development of the South Weymouth NAS into the largest business and residential area in Southeastern Massachusetts. This bottleneck must be broken. And when it is, this line can service FR/NB. I believe Kyla Bennett, from the Town of Easton and a representative of PEER, will submit comments from work she has done showing a short term option (using Cape Rail service) to provide train service to FR/NB over this line. This may be a viable, cost effective, short-term and environmentally sound option while the larger project is designed and constructed.

Is it possible to believe that this project to break the bottleneck in Quincy will not be built? Should we wait while we spend \$1.4 billion on an environmentally damaging project through Stoughton and only then plan to build this project and spend what will be even more than the projected \$3.4 billion?

So with those views as a backdrop, I ask that you keep the Attleboro option and the Full Middleboro option both on the table for the full Federal and State environmental analysis.

IMPACTS OF BUILDING THE SCR PROJECT THROUGH STOUGHTON

Little attention has been paid to the impact of building the project through Stoughton.

Stoughton is considered to “have train service”, therefore why spend time looking at the impacts further? Even the presentations of alternatives failed to show the double track construction north of the Stoughton Train Station. I have enclosed a CD that I wish to be part of the record that shows this overlooked expansion, shows pictures and notations of locations in Stoughton and surrounding towns and depicts the concerns that I mention. It also includes some likely mitigation measures.

If the project is built through Stoughton,

- there would be a double track through the entire town, where at present there is one track through only half the town,
- passenger trains that are slowing down to make their last stop at the end of the line would continue, some without stopping, and
- freight trains that are either non-existent or are a very rare occurrence in downtown Stoughton would be a common occurrence and very long.

There has not been through train service for over 50 years – in which time the town has grown from about 10,000 to 30,000, where not every family had a car to now where almost everyone has a car - increasing traffic much beyond the increase in population.

⁸ The service improvements will help the Needham Line, the Forge Park Line, the Providence/Attleboro Line, and the Stoughton Line because all use part of the AMTRAK system.

Yet no attention seems to be paid to the facts that

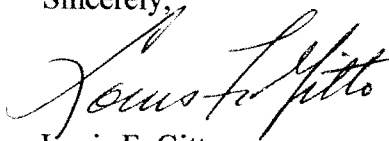
- The train will pass through the center of the town close to and parallel to Route 138 to the south of the Train Station and then close to and parallel to Route 27 to the north.
- There are 8 at-grade crossings in less than 2 miles, 4 of these within about 0.3 miles in the center of the town with little space to stack vehicles when trains come through.
- There currently are significant traffic delays in Stoughton Center; where route 138, route 27 and route 139 all converge and cross within an extremely short distance.
- The track is also near three schools, the West Elementary School, the O'Donnell Middle School and the Stoughton High School.
- There may be significant freight service on this line that has not even been addressed or confronted; yet at the public hearing in Taunton on 12/3/2008, this was a significant topic of interest from the more southern communities in that area looking for commercial expansion.

There are significant safety concerns relating to both vehicular and pedestrian traffic as well as traffic flow issues. There are enormous social concerns relating to the erection of catenary supports and electric wires for electrified trains (that will come either immediately or over the long-term operation of the system). Stoughton is not a rich community; in fact it has environmental justice areas within its borders. Stoughton does have a downtown overlay district designed to create business opportunities and higher density residential development within walking distance of business and transportation. But Stoughton needs an inviting environment in which to prosper. Creating an environment that produces traffic congestion, safety concerns and an uninviting visual effect does nothing positive for the community. Instead it shifts the social overhead costs from a few people who ride the train onto a Stoughton population that is saddled with the disbenefits 24/7.

There are no easy solutions to the traffic, safety and visual problems that this project, if built through Stoughton, would impose on this community. But the solutions may include putting the rail line below the grade of the roadways from south of Plain Street to north of either School Street or Simpson Street. That would solve some of the at-grade crossing problems. It may solve the problems of unsightly catenary towers and electric wires through the down town. There remain many issues of freight transport of materials that are unsafe in a train accident situation, hazardous waste transport, aesthetics, noise, vibration, maintenance of wildlife corridors, Train Station (location, amenities and parking), etc. that must be addressed.

Thank you for your careful attention to these comments.

Sincerely,



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

Enclosure: CD with contents to be included in the record