



December 16, 2013

Richard K. Sullivan, Jr.  
Executive Office of Energy and Environmental Affairs  
Attn: Purvi Patel  
100 Cambridge St., Suite 900  
Boston MA 02114

RE: Comments on the Expanded Environmental Notification Form for the Mass Central Rail Trail – Wayside Branch, MEPA # 15133

Dear Secretary Sullivan:

WalkBoston has reviewed the Expanded Environmental Notification Form for the Mass Central Rail Trail – Wayside Branch. We are very pleased that this facility is being seriously examined for construction, as it is essentially the spine of a trail network that will eventually extend east-west across the full width of the state. As proposed, the new trail will extend 23 miles through eight communities, through a 19 feet wide corridor reserved for construction. The proposed trail will be 10' wide. Its importance cannot be understated: it will serve as the main stem of a network of state-wide greenways.

Our analysis of this proposal suggests that design of the rail trail should ensure that it includes features attractive to a wide range of users, including more than pedestrians, cyclists, and in-line skaters. The trail should be designed to encourage extensive use by runners and joggers. We bring this suggestion into the current review process because it may lead to a consideration of additional width and different materials on a trail surface that provides the best possible conditions for runners and joggers.

Why is WalkBoston involved with runners and joggers?

WalkBoston has become involved with runners and joggers because we work for all people on foot –whether they walk slow or run fast – all using the same facilities. For 6 years, WalkBoston has been the recipient of support from the running community through the Boston Marathon Charity program, first as a Boston Athletic Association team and subsequently with charity bibs provided by the John Hancock Insurance Corporation. Our runners have enjoyed partnerships with us and with our coaching team under a program we have called RunBoston. Our staff includes competitors who have run the Marathon and we now have a staff person who is a United States Track & Field (USATF) Certified Level 1 Coach and an Executive Board member of the Mass State Track & Field Coaches Association (MSTCA).

Why add space for runners and joggers?

Running and jogging are growth industries. In 2012 over 29,000,000 people ran 50 or more days per year. Evidence of runners is often seen near pathways throughout the state, where they have made their own parallel trails, running in the grass until a semi-permanent dirt path becomes established. Recognizing that such running paths are beneficial to runners,

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the state Department of Conservation and Recreation has not only retained the informal paths, but is also thinking of new ways to add permanence to running paths that would fully incorporate runners and joggers in their path-making.

#### Why are runners different from other trail users?

Runners prefer a 'soft' running surface, yet rail trails are most frequently constructed with a firm surface such as asphalt or concrete, chosen because these surfaces can serve the maximum number of potential users. But nearly all runners agree that a softer surface would be preferable. Concrete is uniformly cited by runners as the hardest surface - the most harmful surface for runners who want to avoid physical injuries. Paths constructed of grass, dirt, wood chips or stone dust are the four top preferred options for surfaces for running, because these surfaces are less likely to result in physical injuries such as a twisted ankle, shin-splints, sprains, Achilles tendonitis or other impact-related injuries. Soft surfaces, such as stone dust, lacking pebbles or rocks that might make running dangerous, also provide runners with greater traction and more control over pace and muscle use.

#### What design features could encourage running?

Parallel running paths could be on both sides of the trail or on only one side, where a path would need to provide for two-way running traffic. The running path could be immediately adjacent to the paved trail or separated from it by a few feet. The path could be from 2-6 feet wide and should be as nearly free of camber in cross-section as possible. The former use of the corridor for rail service means that the gradient of the trail will be easily manageable for runners. Special signage is not necessary, as the alternative trail surface provide explanation for the existence of the addition to the trail.

A separate, parallel path would be useful for runners and possibly walkers as well. Such a path could not only provide the running surface runners prefer, it would also remove runners from the stream of bicycle and pedestrian traffic on the principal portion of the trail. Walkers could also use the path if they prefer a soft walking surface or would like to be somewhat removed from other trail traffic.

#### Where have running surfaces and separate facilities been provided?

The 10 mile long Battle Road footpath is the best-known example in Massachusetts, as it provides a stone dust surface for its entire length between Lexington and Concord.

In Janesville, WI, off-street sections of the proposed bicycle path system are designed to meet AASHTO guidelines and WisDOT recommendations. A 10-foot two-directional paved path is the intended design for most sections. These off-street path segments are required through local regulations to include a two foot wide crushed gravel shoulder on at least one side to accommodate runners and walkers.

In Colorado Springs, CO, the Design Guidelines for US 24 Rural Section 25 include two types of trails paralleling the highway: primary trails, usually 12' wide and paved with concrete; and secondary trails, adjacent soft surface trails, varying in width and designed to accommodate walkers, joggers and equestrian users.

In Denver, CO, several local trails provide both hard-surface and soft-surface parallel trails. The same approach has also been used in St.Louis, MO, Scottsdale, AZ., Minneapolis, MN, Newark, DE, at several locations in Florida, and along the Chesapeake and Ohio Canal in Maryland.

How can a soft surface be added to the Massachusetts Central Rail Trail project?

The proposal for this rail trail includes a specified right-of-way (negotiated with the MBTA) that is 19 feet wide. Within this right-of-way, a 10-foot wide path is proposed to be constructed. The 9-foot space that remains will provide a buffer to neighboring land uses, but a portion of it might be used for a running path, which could be constructed at the same time as the proposed rail trail. This space may vary in width as the rail trail passes over or under bridges, or near physically dangerous, precipitous banks. Locations where it is impossible to construct a parallel path might be avoided by requiring runners to rejoin the main path for a limited distance.

What costs might be incurred?

Anticipated costs for construction of a running path vary considerably, but brief research suggests that the use of stone dust appears to cost less than asphalt. This would need to be corroborated.

Adding separate elements for runners fits with the state's self-image as the most well-known and important marathon running state in the country. The running trail would clearly support the burgeoning running shoe industry that includes three shoe-building companies with headquarters in Massachusetts. Because of its considerable length, the rail trail could well serve as a training facility for runners who are vying for a running bib for the Boston Marathon. It could serve the Boston Athletic Association, which has just declared its intention to form a high-performance elite team to dig in and focus on creating a national-caliber and, hopefully, a world-class-caliber team that lives and trains in the Boston area. The trail just might also provide the setting for preparing a winner for the annual race in April!!

We appreciate your consideration of our comments and look forward to your responses to them. Please feel free to contact WalkBoston with questions you may have.

Sincerely,

A handwritten signature in black ink that reads "Wendy Landman". The signature is written in a cursive, flowing style.

Wendy Landman  
Executive Director

Cc Joe Orfant, DCR  
Dan Driscoll, DCR  
Paul Jahnige, DCR  
Craig Della Penna, Mass Central Rail Trail , Coordinator