



October 25, 2013

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

RE: Comments on the FEIR/FEIS on the South Coast Rail Project MEPA #14346

Dear Secretary Sullivan:

WalkBoston has reviewed the Final Environmental Impact Report/Final Environmental Impact Statement (FEIR/FEIS) for the South Coast Rail Project. The project has the potential for improving the mobility of residents throughout the southern part of Massachusetts. Plans for a rail line in this underserved sub-region are intended to expand economic opportunities, reduce traffic, improve air quality, and preserve open space. Equally important goals are to focus on increasing economic opportunity for residents of three cities along the line where substantial transportation obstacles hinder finding and holding jobs in relatively close proximity to affordable housing.

In 2012, MassDOT announced a bold mode shift goal of tripling the number of walking, bicycling and transit trips by 2030. This project is one of the ways for the state to promote mode shift, and maximizing intermodal access to and from the rail line will help Massachusetts meet this goal.

As we advocate for pedestrian safety and convenience, we are concerned about how walking will be improved in and around the station sites along the rail line.

1) Creating opportunities for walkable employment and commercial districts around the stations

Adding new rail service is a rare opportunity to create transit-accessible, walkable places. Prospective riders will use the route not only for access into Boston, but also for access to each of the communities along the route. All of the proposed stations are viewed as potential locations for employment, and each of the stations is designed to handle substantial ridership. However, the land use and economic development opportunities in each station area have been left relatively unexplored. More detail is needed to support the conclusion that the economic and mode-shift potential of each station will be fulfilled.

- a) Half of the proposed stations are to be built primarily from scratch on raw or undeveloped land. Extensive resources and encouragement may be required from state or local government or private developers to bring totally new centers of activity into being, and this is clearly the hope of smaller communities who want to benefit from the proposed rail line. Detailed community planning, with support from MassDOT, has been underway. It is important that it lead to plans not only for parking

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lots but also to discern what kinds of development might occur at or near stations in undeveloped areas, and what state or private assistance might be required to make it come about.

- b) Half of the station sites are in urban settings in commercial or residential neighborhoods. The research undertaken by the proponents envisions the possibility that these stations may encourage “firm-clustering,” also known as “agglomeration,” a term suggesting the tendency of new firms and households to locate near existing firms and households. For this to occur near stations in the larger cities and towns of New Bedford, Fall River, Taunton, Stoughton and Canton, may require considerable nurturing and support from state and regional public and private actors. From a regional point-of-view, with the “agglomeration effect” stretched all the way to the center cities, it might be possible to attract employment sources such as “back offices” to sites adjacent to the stations along this line.

2) Anticipated Pedestrian Activity - Projections For Stations

Pedestrian access must play a central role in station location or design in both developed and undeveloped settings. Pedestrian analyses included in the FEIR/FEIS’s appendix suggest that there have been thorough examinations and estimates of activity. However, the projections of pedestrian activity seem optimistic in some areas, because they include long walking trips to stations. The over estimates tend to be at stations that are relatively remote from residential areas, as in North Easton, Taunton Depot, Raynham, and Freetown, and in the estimates that include long walks to Kings Highway and Fall River Depot. By contrast, projections of pedestrian activity at Taunton Station seem relatively low for a station located in a densely built city.

Projections of pedestrian activity are very important, both in establishing the need for and benefits from the stations included in this proposal. We would be very interested in knowing more about these projections, and the theory that people will walk relatively long distances to get to these stations. If that is not a basic theory for the analyses, the alternative would seem to be development around stations that has not yet been articulated in the report. The work suggests that, as the project nears completion, there may be significant marketing efforts required to encourage long walks to stations, and certainly to encourage construction of housing around stations built on raw land.

3) Station Site Selection And Design

Stations have been proposed for town centers, for close-in neighborhoods in larger cities, and for raw land in more suburban or rural locations. While the more urban locations appear well thought out, the selection of the others has not been explained in terms of multi-modal access or land use. We have assumed that the need for parking played a key role in site selection because nearly all of the proposed stations include significant parking lots (or garages) immediately adjacent to the tracks and platforms.

Not all of the sites have a clear relationship to pedestrian access, and in some cases the sites appear to serve only automobile traffic. These stations tend to be located a fair distance from the local roadway network, usually further than a satisfactory walking distance. Some sites are adjacent to or behind single businesses or shopping centers, but this proximity seems unlikely to result in substantial pedestrian activity.

It is possible that some of the very undeveloped station areas may in the future attract developers who will help to build the stations and then surround the stations with appropriate development. There is a precedent for private developer assistance in building a rail station adjacent to large development projects, at both Assembly Square in Somerville, and adjacent to New Balance in Allston.

4) Pedestrian Access Across the Tracks

Allowing pedestrians to reach the platform from either side of the tracks is an important element of station design to encourage ridership.

For station locations that are located on largely undeveloped land, access to stations is focused on the side of the tracks where there is a parking lot, even if there are residential areas on the other side of the tracks that might be served by additional access. Paths that cross the tracks should be explored in several locations. For example, At the North Easton Station, a residential community on the west side of the tracks does not have access into the proposed station. The FEIS/FEIR describes a pedestrian and bicycle route that is nearly three miles long – far too long to successfully attract passengers to walk to the station. Yet the station is only a few hundred feet from the nearest portion of this residential community.

Crosswalks over the rails near the stations are needed to maximize pedestrian access. It is especially unfortunate to see one-sided access in some of the more densely developed locations. For example at the King's Highway station in New Bedford, pedestrian access from the east quadrant of residences surrounding the station is severely constrained. From the nearest residences in this quadrant it is at least 1,500' to the station via a difficult walking route along Kings Highway and a sidewalk along the rail line. Access could be significantly improved by providing a walkway between Church Street and the proposed Kings Highway Station, midway between Carlisle and Irvington Streets. This walkway would provide a convenient passage into the station from the hundreds of homes that would be within a walking distance of 1,000.' Bus service on Church Street might also help riders get to the station efficiently via this walkway.

4) Tourist Traffic

Easton Center, New Bedford and Fall River have distinctive tourist attractions near the proposed stations. If one of the goals of the new rail service is to attract tourists, the design of the stations must include walkability considerations.

- a) In Fall River the proposed Battleship Cove Station is well located for tourist access to the marine museum on the waterfront.
- b) In Easton Center, with its wealth of historic structures and wonderful architecture, the proposed high platforms may not be in keeping with the traditional appearance of the community. It may be possible that adding the platform could alter the historic appearance in ways that might limit future tourist appeal.
- c) In New Bedford, the proposed rail service at Whaletooth Station is roughly ½ mile from the Whaling Historic District and downtown New Bedford. A proposal to extend rail service to a station at the State Pier (noted in the FEIS/FEIR) would bring access

very close to downtown and the historic district. The State Pier also provides access to ferries leading to a number of sites that might be attractive to rail riders. Time saved in walking from the station into the city could be as much as 20 minutes and the walk would be more attractive as it would avoid passing through many industrial and highway uses.

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

Sincerely,

A handwritten signature in black ink, appearing to read "Robert Sloane". The signature is fluid and cursive, with a prominent initial "R" and a long, sweeping tail.

Robert Sloane
Senior Project Manager