



WalkBoston

May 25, 2011

Secretary Richard K. Sullivan, Jr.  
Executive Office of Energy and Environmental Affairs (EEA)  
100 Cambridge Street, Suite 900  
Boston MA 02114  
Attn: MEPA Office, Aisling O'Shea

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

RE: EEA No. 14346

Dear Secretary Sullivan:

WalkBoston appreciates the opportunity to provide comments on the South Coast Rail Draft Environmental Impact Statement/Draft Environmental Impact Report. This important project is one that could positively impact the mobility of a great many residents of the southern sub-region of the Commonwealth.

In terms of advocating for pedestrian service, we are concerned about certain analyses in the proposal and hope there are explanations for the actions based on them. Because of our concern, we request that certain points be given further attention during any follow-on permitting and planning work on the project. These are:

1. **A safe walking environment.** Construction of any of the options in this report will result in a need for pedestrian improvements. Differing locations call for distinct approaches to pedestrian safety. Depending on the location, improvements may include new sidewalks to complete or connect to a network, signal-timing changes at intersections to allow more time for pedestrian crossings, passively activated crossing signs at pedestrian crossings, crosswalk striping, and pedestrian count-down signals. The proposed improvements included in this report appear to be a first cut. We assume that more measures for pedestrian safety will be needed and are to be added at a later date. It would be very helpful if these proposals were outlined.
2. **Traffic calming elements** are planned for streets in the Town of Easton in association with one of the alternatives. We would like to know how traffic calming suggestions were approached and handled in other communities, and what local responses may have been to such suggestions. Were traffic calming ideas fully explored in relation to each station?
3. **Each alternative displaces the use of a specific right of way by pedestrians** for recreation purposes. We trust that there has been study to ascertain the importance of recreational (and possibly commuting) access in communities where the commuter rail will eliminate such use. This could be particularly important in communities that do not have alternatives

**MAKING OUR COMMUNITIES MORE WALKABLE**

Old City Hall | 45 School Street | Boston MA 02108 | T: 617.367.9255 | F: 617.367.9285 | info@walkboston.org | www.walkboston.org

for recreational opportunities. We wonder if unused rail corridors that are not to become part of a future commuter rail system can be candidates for permanent trails?

4. **There is some confusion about walking distances to stations.** A distinction has been made between a 5 minute walking distance (usually a 0.25 mile distance) and a 0.5-mile perimeter around proposed stations. See, for example, Figs. 4.4-8 to 4.4-25 and 4.2-8 to 4.2-34 and 4.10-10 to 4.10-32. Why are there differences in the analyses of radius determination and what impact does it have on pedestrian access?
5. **The proposed Battleship Cove Station in Fall River** does not seem to be as detailed as other proposals (Figure 4.5-54). Because of its location adjacent to the marine museum and downtown, this location seems to be potentially important for tourism, for access to downtown Fall River and for commuter traffic. Yet it appears to be relegated to part-time use. What is the explanation for this approach?
6. **Fall River access issues need immediate attention** irrespective of the process of bringing new rail or bus access to the South Coast sub-region. We are particularly concerned about data that show that environmental justice communities in Fall River are already significantly disadvantaged. The analysis shows that all proposed alternatives would improve access to jobs for Fall River residents by more than 100% and would improve access to hospitals for Fall River residents by up to 400% (Fig. 4.4-51). No other community in the south coast study region has such a large deficiency of access. In the event that the South Coast project does not move forward, are there any opportunities for ameliorating this situation?

Thank you for the opportunity to offer comments on this project. Please feel free to contact us if you have any questions.

Sincerely,

Wendy Landman  
Executive Director

Robert Sloane  
Senior Planner

Cc MassDOT Secretary Jeffrey Mullan  
Kristina Egan, Director of South Coast Rail