



January 8, 2009

Secretary Ian Bowles
Executive Office of Energy and Environmental Affairs, MEPA Office
100 Cambridge Street, Suite 900
Boston, MA 02114

RE: Comments on the Environmental Notification Form, South Coast Rail Project
EOEA # 14346

Dear Secretary Bowles:

WalkBoston has reviewed the Environmental Notification Form for the South Coast Rail Project, a large project that will have significant impacts on transit service in a rapidly growing region of the state. Since essentially all patrons of transit arrive on foot, we feel that it is extremely important to make pedestrian access as convenient and safe as possible – both on-site and in the surrounding area. Pedestrian access must be easy to accomplish, whether the transit patron arrives in the station area as a walker, a bicyclist, a rider on another form of transit, a driver/parker, or someone who is dropped off at the station.

Perhaps because of the regional scale of the study, the first round of site selection for transit stations gave scant attention to pedestrian concerns in the ENF. However, the document clearly points the way to the need for detail that includes pedestrian access. Concerns of walkers will become major during the detailed analysis of each station site that will be undertaken in the upcoming DEIR/DEIS. For this reason, we offer our comments for inclusion in establishing the scope of work for the next phase of study.

Summary of WalkBoston's comments on the ENR

1. Accommodate all modes of transit station access
2. Detail neighborhood pedestrian needs
3. Detail deficiencies in pedestrian access
4. Relate pedestrian needs to high-density neighborhoods
5. Explore transit-oriented development at all regional transit stations
6. Maintain flexibility in station siting and development

Background

The South Coast Rail Project ENF focuses on existing rail or road corridors as potential locations for new rail stations, and documents several successive steps in identifying and analyzing the key criteria used to assess preliminary station sites:

- Provide appropriate track geometry (a tangent track section) and sufficient available land to construct 800-foot platforms for each rail station.
- Not require new development within an Area of Critical Environmental Concern (ACEC).
- Not be located within a public water supply Zone 1.
- Be located on vacant land or with areas of foreseeable potential for redevelopment.

Using these criteria, EOT and the Southeastern Regional Planning & Economic Development District (SRPEDD) identified possible station locations. As the regional planning agency serving

27 of the communities in the south coast area, SRPEDD staff solicited public input and identified a total of 73 possible rail and bus station locations.

Following the identification of potential station sites, a screening process was carried out based on criteria of practicability, minimizing environmental impacts, and the ability to support smart growth. Additional criteria included:

- Strengthen historic town, village and city centers while providing a foundation for new mixed-use neighborhood centers, adaptive reuse potential in station site areas and compact, mixed-use development on underutilized land adjacent to proposed stations.
- Locate stations in already developed areas, close to existing housing, jobs and/or services, and existing road, water and sewer infrastructure.
- Offer a mix of park-and-ride stations, local-draw stations and stations that would efficiently serve riders arriving by a range of modes.

Using this screening process, the number of potential station locations was narrowed, and sites in several older communities were emphasized – particularly older downtowns in New Bedford, Fall River, Taunton, Easton and Middleborough.

Next phase of the project

In the South Coast Rail project DEIR/DEIS, key elements of analysis will address project impacts on:

- Improved accessibility to jobs and educational opportunities.
- Enhanced property values.
- Increased population.
- Increased attractiveness to employers (with increased tax revenues for communities).
- Transit-oriented development opportunities and communities.
- Controlled and managed growth in accordance with Smart Growth planning.

WalkBoston is concerned that this review of potential effects of the South Coast Rail Service may not include an assessment of the foot traffic that will concentrate at each station. We are hopeful that the project can incorporate a basic approach that promotes walking. WalkBoston's comments focus on our suggestions about pedestrian concentrations and access to stations.

1. Accommodate all modes of transit station access

Transit is inherently dependent on pedestrians approaching the station having arrived at the station site using different modes of transportation: foot, bicycle, bus, car which is parked at the station, or car as a passenger who is dropped off. All of these modes must be accommodated at each station.

2. Analyze pedestrian and other access to each station:

Outline all existing and proposed access within a 1 mile radius from the station site:

- Existing and future sidewalks and paths that will provide access to the station.
- Existing and future bicycle routes to the station.
- Existing and future bus routes to the station.
- Existing and future streets and highways expected to serve as major access to the station.

3. Analyze the details of the pedestrian network

- Identify needed sidewalks and paths for access to the station site including missing links of sidewalk to provide continuity of routes, existing sidewalk conditions and anticipated maintenance needs for each major route, difficult or unpleasant walking conditions

- needing amelioration
 - Potential bus connections to the station site.
 - Clear and safe routes within or immediately adjacent to the station site for pedestrian access to the station platform including:
 - Pedestrian street crossings – identify those that are protected or need protection, existing and needed crosswalks and potential walk/countdown signal locations.
 - The potential for green parking lots that include separated paths for pedestrians leading to the station platform via, say, drainage swales flanked by sidewalks.
4. Evaluate the broad changes to neighborhoods that transit access could bring
- Existing higher density neighborhoods as sites for stations – How will pedestrian access be provided for these neighborhoods?
 - Projected increases in housing density near the stations How will pedestrian access be provided for these neighborhoods?
 - Correlation of station locations and pedestrian access with economic justice communities.
 - Future transit growth, induced development, and impacts on pedestrian needs of the project.
5. Consider how the project will ensure walk-in ridership at all regional stations
- Create transit-oriented developments at large regional-scale parking lots, paired with housing at a relatively high density.
 - Create a model of potential higher density development to support the transit stations.
 - Limit stations to sites where a surrounding higher density of housing is assured.
 - Get commitments to local rezoning for higher density housing before the station site is committed.
 - Help cities and towns improve land use and zoning as transit service is being planned. (The Raynham Dog Track is a possible example for re-use as dog racing is no longer allowed in MA. If used solely for parking, a major opportunity for TOD would be lost.)
6. Maintain flexibility in station siting and development
- Use evaluation criteria that include pedestrian concerns.
 - Eliminate stations that cannot be made safe for pedestrian uses, and examine alternative sites that better serve pedestrian needs.
 - Promote redevelopment of brownfield sites.
 - Make certain to provide service to environmental justice communities.

Ultimately, the selection of an alternative for South Coast rail service will turn in large part on how well it serves the local people that use its stations. Safe and convenient pedestrian access is a central concern to many of residents in these neighborhoods.

Thank you for the opportunity to comment on this project.

Sincerely,

Wendy Landman
Executive Director

Robert Sloane
Senior Planner