

South Coast Rail Line
Position Statement
Taunton River Watershed Campaign

July 25, 2007

Background: The Massachusetts Bay Transportation Authority (MBTA) is planning a major extension of its commuter rail system from Boston through southeastern Massachusetts to New Bedford and Fall River. The projected cost is approximately \$1.4 billion. Benefits identified by the MBTA include enhanced access to public transportation and regional economic growth and development. The Commonwealth has hired a project manager to conduct a land use study in the project corridor and to work with the affected communities to plan for concentrated transit oriented development around the proposed new train stations. An environmental consultant has also been hired to conduct further environmental analysis and planning in relation to permitting requirements.

Position: The Taunton Watershed Campaign generally supports commuter rail improvements as an alternative to highway widening. The Campaign also supports mixed-use development concentrated on land that is appropriate for development and in close proximity to transit and other infrastructure. However, we have identified serious environmental concerns summarized below associated with this particular rail extension project.

A number of key environmental concerns were not addressed adequately or in sufficient detail during the previous Massachusetts Environmental Policy Act (MEPA) review process conducted for this project. This process extended from October of 1995 to August of 2002. These issues must be reconciled in full before the project is permitted and constructed.

The Final Environmental Impact Statement (FEIR) identified the "Stoughton route" as the preferred alternative for this project. The Stoughton route would impact several major wetland systems in the Taunton River Watershed, including the Hockomock Swamp and the Pine Swamp. The Assonet Cedar Swamp will be impacted no matter which route is used. Affected ecosystems (wetlands, uplands and streams) include globally rare habitats supporting numerous rare species. The significance of these species and their habitats have been documented by the Massachusetts Natural Heritage Program and are protected by the Massachusetts Endangered Species Act and the Massachusetts Wetlands Protection Act. Some of these lands are designated as Areas of Critical Environmental Concern. The proposed line runs through conservation lands in several locations. Some are owned by the Massachusetts Division of Fisheries and Wildlife or other land conservation agencies and are protected under Article 97 of the Massachusetts Constitution. Additional areas are protected by private conservation organizations such as Mass Audubon.

The MBTA has indicated its intention to review the alternative routes that were rejected during the previous process (the “Attleboro route” and the “Middleboro route”). The environmental impacts of using these routes have not been fully documented. The MBTA should provide detailed analysis of all environmental impacts of the alternatives routes to compare and select the least environmentally damaging practicable alternative as required by the federal Clean Water Act and other laws. We look forward to reviewing this data and providing comments.

The Campaign’s specific concerns include the following four major points

1. Wetlands and Rare Species Impacts

As presently proposed, the project will cause significant adverse impact to wetlands, intermittent and perennial streams and rare species.

- Impacts extend well beyond the footprint of the actual work. Some of these were described in the 2002 Final Environmental Impact Report. Impacts that have not been adequately evaluated to date include:
 - Hydrological effects on sensitive wetlands and streams – even small changes in hydrology as a result of a railway embankment or other structures in a wetland can have large changes on the entire wetland. This is of particular concern for Atlantic White Cedar Swamps, which are especially sensitive to changes in hydrology or water quality.
 - Fragmentation effects – railway embankments divide habitats and create unnatural edges within contiguous habitats. This can affect the viability of local populations of plants and animals.
 - Secondary growth impacts – experience with other rail projects shows increased rates of development in the areas surrounding rail stations. If communities are not prepared in advance and sensitive habitats protected through project related mitigation commitments, these secondary impacts are likely to be significant.
- The MBTA has not demonstrated that the anticipated impacts are unavoidable, cannot be minimized or adequately mitigated against as required by federal and state law.
- In some areas wetlands, vernal pools, streams and rare species habitats have not been correctly documented and potential impacts evaluated.
- Some of the wetlands impacted, particularly by the Stoughton route, feature globally rare wetland habitats, such as Atlantic White Cedar swamps, that are not replaceable. The Hockomock Swamp includes the largest Atlantic White Cedar swamp in Massachusetts. Several globally rare species are also found in the Hockomock Swamp including the Water-willow Steam Borer (moth), Long’s Bulrush (plant) and Hessel’s hairstreak (butterfly).
- For other impacted wetlands, wetlands replication cannot completely and effectively replace the functions and values lost due to destruction and fragmentation of existing natural systems. Therefore adequate environmental

compensation must be proposed, including protection of additional sensitive lands within the affected sub-watersheds.

2. Growth Management in Affected Communities

- Preparation for growth impacts prior to project permitting and construction in all impacted communities is essential. This preparation should include adoption of updated open space plans and innovative zoning that take into consideration the expected impacts. The plans should identify areas appropriate for development and areas that warrant protection based on ecological, agricultural, historical or cultural significance.
- State financial and technical assistance must be provided to help understaffed municipalities undertake planning, zoning and project review during the project.
- Mitigation must include financing for high priority open space protection.
- Rail station locations must be carefully selected in relation to existing infrastructure and town/city centers, and avoid areas of particular environmental sensitivity.

3. Transportation Planning Considerations

- The estimated cost of the project now stands at \$1.4 billion. This figure has continually escalated since the project was first proposed in 1995. Full cost estimates must include a comprehensive approach to avoiding the most critical environmental impacts and mitigating others. The high cost of the project must not be used as an excuse to avoid environmental impact minimization or mitigation measures.
- While a reduction in vehicle traffic could improve air quality and pollution caused by roadway runoff, the MBTA has yet to demonstrate that the projected ridership on this line will significantly reduce vehicular traffic. MBTA should do a full analysis of potential traffic reduction, taking into account the population growth that is likely to be spurred by the rail development. It remains unclear, for example, whether the new rail line would preclude or delay the need to widen Route 24.

4. Air Quality and Alternative Energy

Typically rail projects in New England are fossil fuel dependent. However hydrocarbon emissions from locomotives degrade local and regional air quality, affecting people and negatively impacting wetlands, waterways, groundwater and natural habitats. In addition we face global climate change as a result of burning diesel fuel and will face critical limitations on the availability of fossil fuels in a matter of a decade or less.

The Taunton River Watershed Campaign urges further analysis of the potential for implementing alternative energy design and sources in the South Coast rail project in order to support sustainable regional development and smart growth. Specifically, the

MBTA should analyze the use of electric locomotives in order to avoid the damaging effect of fossil fuel emissions upon sensitive receptors and the environment generally.

For more information on this position or the Taunton Watershed Campaign, contact:

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