



July 7, 2016

Owen P. Kane
Senior Counsel to the Board of Directors
Massachusetts Department of Transportation and
Fiscal and Management Control Board
10 Park Plaza
Boston, MA 02116

RE: June 27, 2016 MBTA Fiscal and Management Control Board Meeting Comments

Dear Mr. Kane,

Public Employees for Environmental Responsibility (PEER) is a Washington D.C.-based non-profit, non-partisan public interest organization concerned with honest and open government. Specifically, PEER serves and protects public employees working on environmental issues. PEER represents thousands of local, state and federal government employees nationwide; our New England chapter is located outside of Boston, Massachusetts. PEER has been working on the South Coast Rail project since 2001.

Thank you for the opportunity to provide comments on the June 27, 2016 MBTA Fiscal and Management Control Board (Board) meeting where MBTA General Manager Frank DePaola stated that the Commonwealth will be examining alternatives other than the Stoughton route for the South Coast Rail project. The reasons given for dropping the Stoughton Alternative are the newly estimated \$3.4 billion cost, and the fact that the train would not be completed until 2029. While PEER agrees that the Stoughton Alternative should be dropped, as it is too environmentally damaging and too expensive to complete, there is an even more compelling reason to take a fresh look at the South Coast Rail project as a whole. Specifically, the underlying data and assumptions demonstrating the need for the project are flawed. Because of this, PEER urges the Board to closely examine the need for the project prior to latching on to another expensive mass transportation project. Our specific concerns with the data and assumptions are set forth below.

Definition of the “South Coast study area” is inconsistent, rendering need and ridership analyses worthless. The MBTA defines the South Coast study area in no fewer than five different groupings of towns: the Land Use Study Area Communities, the SCR study area, Social and Economic Environment Study Area Communities, the South Coast Rail Study Area (different than the SCR study area), and the South Coast Rail Corridor Plan Communities. As you can see from the table below, each of the five definitions includes different towns.

Table Showing Five Definitions of the South Coast Region

	Land Use Study Area Communities	SCR Study Area	Social and Economic Environment Study Area Communities	South Coast Region	SCR Corridor Plan
Acushnet	X	X	X	X	X
Attleboro*	X	X	X	X	X
Berkeley	X	X	X	X	X
Bourne		X			
Bridgewater*					X
Bristol, RI				X	
Canton*	X			X	X
Carver		X			
Dartmouth	X	X	X	X	X
Dighton	X	X	X	X	X
Easton	X		X	X	X
Fairhaven	X	X	X	X	X
Fall River	X	X	X	X	X
Foxboro	X			X	X
Freetown	X	X	X	X	X
Lakeville*	X	X	X	X	X
Mansfield*	X	X		X	X
Marion					X
Mattapoisett	X	X	X	X	X
Middleboro*	X	X		X	X
New Bedford	X	X	X	X	X
North Attleboro*	X	X		X	X
Norton	X	X	X	X	X
Portsmouth, RI				X	
Raynham	X	X	X	X	X
Rehoboth	X	X	X	X	X
Rochester	X	X	X	X	X
Seekonk					X
Sharon*	X	X		X	X
Somerset	X	X	X	X	X
Stoughton*	X	X		X	X
Swansea	X	X	X	X	X
Taunton	X	X	X	X	X
Tiverton, RI				X	
Wareham					X
Warren, RI				X	
Westport	X	X	X	X	X

* Denotes towns with an existing commuter rail station.

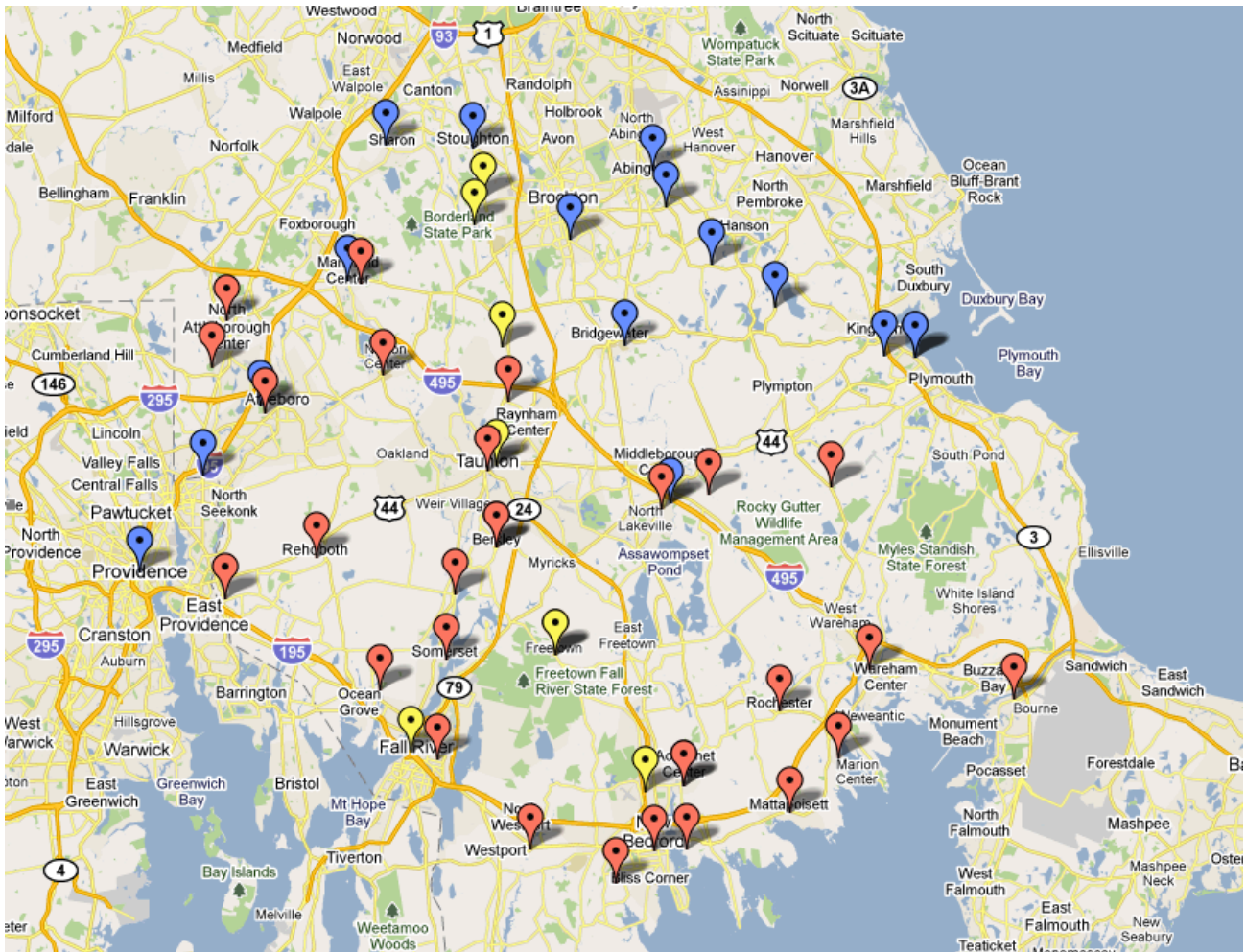
The fact that MBTA cannot provide a consistent definition of the South Coast Region, *on which all the analyses are based*, is of grave concern to PEER. The Board should require that MBTA provide a single, consistent definition of the study area, and calculate ridership, impacts, and alternatives based upon this single definition, before the need for the project is assessed. Moreover, PEER questions why four communities in Rhode Island are contained in the needs assessment for this Massachusetts project.

There are blatant flaws/misstatements in the Environmental Impact Report. In the permitting documents, MBTA states, “No commuter rail service is offered within the South Coast Rail study area. The nearest commuter lines (MBTA’s Providence Line and Middleborough Lines) terminate northwest and northeast of the South Coast region” (see p. 4.1-14 of the Draft Environmental Impact Report). This statement is patently false and misleading. In fact, at least four towns defined as being within the SCR study area by one definition have *existing* commuter rail stations. Moreover, there are eight *existing* commuter rail stations in the South Coast study area as defined by the Land Use Study Area Communities (see towns in red font in Table; note that Canton has two train stations).

The Ridership Analysis Is Flawed. The MBTA measured demand for the rail by examining daily work-related trips between South Coast communities and Boston (note that the question of *which* South Coast communities has not been resolved). Specifically, transit demand was based on 2000 Journey-to-Work (JTW) data. The calculation included all boardings from the South Coast region, including bus trips, despite the fact that buses were anticipated to continue to run. The MBTA claims that 8,000 daily work trips are made from South Coast communities to Boston.

When PEER examined the JTW data, we found that 741 people from New Bedford commute to the Boston area, and 714 commute there from Fall River (see <http://www.census.gov/population/www/cen2000/commuting/mcdworkerflow.html>). This is a total of 1,455 commuting to Boston and Cambridge from Fall River and New Bedford. However, What we also noted that 1,667 people from Fall River commute to New Bedford for work, with another 1,248 commuting to Somerset, and another 1,078 commuting to Swansea (Id.). Similarly, 1,902 people living in New Bedford commute to Fall River, 2,145 to Fairhaven, and 3,761 to Dartmouth (Id.). Therefore, it is worth noting that 11,801 people travel among the cities and towns of Fall River, New Bedford, Somerset, Swansea, Fairhaven and Dartmouth, while only 1,455 travel to Boston. It seems clear that the transportation need is between and among these southern cities, and not to Boston. It is also worth noting that when MBTA proposed the Greenbush Line, they stated that 4,200 riders would board each morning, and that these riders would result in a reduction in highway congestion (see http://www.mbta.com/about_the_mbt/news_events/?id=10890). In fact, by October of 2010, an average of only 2,133 riders used the train each morning, (http://www.boston.com/news/local/massachusetts/articles/2010/10/31/after_3_years_greenbush_ridership_below_projections/) and there was no measurable reduction in highway congestion. Given the Commonwealth’s track record in estimating riders and the beneficial impacts from new train lines, we would hope that the Board would require a more thorough and valid ridership analysis.

PEER also disagrees that the proposed train line will draw people off existing lines to the new trains. MBTA is assuming that people will, for example, leave train stations in their own towns, and drive miles to a different train station. This is non-sensical, and skews the ridership figures drastically. The map below shows existing train stations (blue markers), the SCR study area, the basis for the ridership figures (red markers), and the preferred alternative (yellow markers).



MBTA is assuming that people living in the red marker towns will travel to the proposed yellow marker train stations rather than taking an existing train at one of the blue markers. This is disingenuous. Why would someone living in Mansfield, for example, drive miles to Easton to take the train, when a commuter rail station exists in Mansfield? In fact, of the 28 communities listed in the SCR study area, 13 or more of them have existing, operating train stations closer to them than the ones that would exist if the proposed line were built.

The ridership analysis also assumes that, and takes credit for, riders that shift from one train line to another. They state, “New system-wide boardings represent the overall draw to the commuter rail transit system due to the South Coast Rail project, which represents an increase in capacity along other commuter rail lines as a particular alternative attracts system-wide new ridership. This total is also used to calculate overall cost-effectiveness of the project.” In other words, MBTA is assuming that as riders shift from an existing line to the proposed new line, other riders will take their place on the existing lines.

PEER urges the Board to re-examine the ridership analysis to determine whether this project is truly needed. We understand that Fall River and New Bedford want a train, but the mere fact that it is desired is not enough to warrant the expenditure of hundreds of millions to billions of taxpayer dollars.

The greenhouse gas (GHG) emissions analysis is flawed. As MBTA acknowledges, in order to have a net reduction in greenhouse gas emissions, any alternative chosen would have to divert automobile travel to mass transportation to such a degree that the reduction in motor vehicle emissions from cars would more than offset the increase resulting from the train's or bus's CO2 emissions. MBTA has been claiming for years that the proposed train will reduce GHGs from both the mode-shift away from cars to the train, and because congestion on the highway will ease, resulting in improved traffic flow (no stop-and-go). However, MBTA failed to take into account the fact that even if the proposed train did result in fewer cars on the highway, this benefit would disappear as more cars began to use the highway (induced traffic). This is a well-known traffic phenomenon which MBTA continues to ignore. Failure to take induced traffic into account renders the air quality analysis invalid. The Board should re-examine the GHG emissions analysis with this in mind.

The Stoughton Alternative is unpermittable. PEER understands that some people within the MBTA and DOT would like to keep the Stoughton Alternative on the table for the future. PEER would like to take this opportunity to reiterate that the Stoughton Alternative is environmentally unpermittable. Even though the Corps determined that the Stoughton route is the least environmentally damaging practicable alternative (LEDPA), this does not mean that the project can be permitted. Specifically, the environmental impacts associated with the Stoughton alternative would cause or contribute to significant degradation of waters of the United States, in violation of section 230.10(c) of the Section 404(b)(1) guidelines, the regulations protecting wetlands under the Clean Water Act. Therefore, pursuing the Stoughton alternative would most likely not result in any train from Fall River/New Bedford to Boston; a different alternative (if one is truly needed) is the only path to fulfilling this promise. It is also worth noting that at the June 27, 2016 meeting, Kristina Egan was incorrect when she stated that because the Corps determined that the Stoughton alternative is the LEDPA, it is the only alternative that can be legally permitted. The LEDPA is determined after taking into consideration logistics, cost and technology (among other things); these factors can change over time, as indeed, the cost has changed in this case. Therefore, the applicant can suggest a new LEDPA based on changed circumstances, and a different alternative can move forward.

Moreover, Ms. Egan suggested at the meeting yesterday that the MBTA should proceed to build the southern triangle; however, the Commonwealth would need a Corps permit for this work, and a project cannot be segregated in this manner. It may be possible that the alternative the Commonwealth ultimately builds will not need the southern triangle, and therefore it is premature to proceed with that massive step.

Conclusion. As the MBTA proceeds in its examination of other alternatives, PEER asks that the Board re-examine both the ridership and the need for this project. We continue to believe that the figures and analyses in the Environmental Impact Reports are flawed, and that the Commonwealth should reassess the project as a whole.

Thank you for the opportunity to comment.

Sincerely,

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