



TOWN OF EASTON
MASSACHUSETTS
Office of the Town Administrator

DAVID A. COLTON
Town Administrator

May 27, 2011

Alan Anachecka-Nasemann
Senior Project Manager
Regulatory Division, Permits and Enforcement Branch
U.S. Army Corps of Engineers
696 Virginia Road
Concord, MA 01742-2751

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

Re: EEA # 14346, South Coast Rail Draft Environmental Impact Statement/Report

Dear Mr. Anachecka-Nasemann and Secretary Sullivan:

The Town of Easton is writing to provide comments on the Draft Environmental Impact Statement/Report (DEIS/DEIR) for the South Coast Rail project. While the information provided in the DEIS/DEIR does not seem to clearly demonstrate that project alternatives within the Stoughton corridor are the Least Environmentally Damaging Practicable Alternative (LEDPA), in the DEIS/DEIR, the Massachusetts Department of Transportation (MassDOT) identifies the Stoughton family of alternatives as the preferred corridor for the project. The selection of an alternative within this corridor as the LEDPA would have significant impacts on the Town of Easton. As the DEIS/DEIR only provides summarized information for each project alternative, we request that the Final EIS/EIR be required to provide additional, detailed information on project impacts and mitigation measures. Please see below for our comments to specific concerns we have at this point.

Public Safety

Project alternatives within the Stoughton corridor will result in ten new at-grade crossings, many with limited visibility, or line-of-site. These proposed crossings are safety hazards for motorists and pedestrians. During operation, these crossings may

result in emergency response delays. The Town of Easton requests that the proponent provide the following:

- Safety education program - Provide safety information to children within the school system and a general public awareness campaign.
- Pedestrian crossings – Install signage indicating the rail line is active and direct individuals to safe crossing locations.
- Deterrents – Provide creative means of deterring people from dangerous crossings. Recent transit studies demonstrate that people quickly become inured to typical warning signs.
- Safety training for first responders on how to respond to and operate in and around the rail system. This should include not just anticipating a moving train blocking a crossing, but the potential for a train to be stuck at a crossing or the crossing gate to be malfunctioning.

Transportation

The DEIS/DEIR proposes two station locations in the Town of Easton, one in North Easton Village and one in North Easton adjacent to the Roche Bros Plaza. Rail service along the Stoughton corridor would also require new grade crossings at Elm Street, Oliver Street, Short Street, Depot Street (Route 123), Purchase Street, Prospect Street, and Foundry Street (Route 106). Additional traffic generated by the new stations and additional vehicle queuing at the new grade crossings would significantly impact the Town's roadway network. In order to help offset these project impacts, the Town of Easton is requesting the following transportation mitigation measures be included in the FEIR/FEIS:

- Upgrade Route 138 (Stoughton town line to Elm Street) – Route 138 is the only way to access the proposed North Easton station. Roadway improvements along this segment of Route 138, which is largely un-signalized and under current traffic conditions has failing Levels of Service, should include signalized intersections at Union Street and Elm Street. Improvements should also include sidewalks and bicycle lanes to enhance pedestrian safety and environmentally responsible transportation options to access the station.
- Upgrade Union Street (Brockton town line to Route 138) - The existing condition of the roadway is adequate for the current amount of daily traffic. However, this roadway will likely serve as a feeder for vehicles coming from the east accessing the North Easton station and will require improvements to accommodate higher amounts of traffic.
- Traffic improvements at the intersection of Route 138 and Route 123 – This gateway intersection is included in the South Coast Rail Corridor Plan as a Priority Development Area. These improvements will enhance the functionality of a critical intersection that will see an increase in traffic due to the proposed station locations.

- Traffic calming measures in North Easton Village - Although the DEIS/DEIR assumes that most riders will either walk or bike to this station, there will be a significant increase in traffic, vehicle queuing, and related parking issues during peak travel times. The DEIS/DEIR does indicate that traffic calming measures will be provided for this location. We request that the FEIR/FEIS provide more detail on these measures.
- Expand public transportation connections – In coordination with regional transit providers (e.g., BAT), MassDOT should work to expand existing routes or create new routes to new rail stations.

Visual

The Stoughton corridor bisects both local and national historic districts that are home to many of the Town’s most significant historic and architectural landmarks such as the Ames Shovel Works complex, historic railway station, Oakes Ames Memorial Hall and the Ames Free Library. The DEIS/DEIR states on page 4.5-39 that, “adverse impacts to the visual environment in the vicinity of the new Easton Village station would be substantial”. The FEIR/FEIS should include plans that show a full-grade separation at Main Street with no visual impact resulting from any vertical or horizontal realignment of the tracks and details on how the new station will be sensitively incorporated into the historic fabric of this area. The DEIS/DEIR also acknowledges there will be visual impacts to residential neighborhoods and open spaces along the corridor. While the DEIS/DEIR provides information on how visual impacts may generally be addressed with fencing or grade separation, we request the FEIR/FEIS provide specific measures to address these visual impacts.

Noise and Vibration

Portions of the Stoughton corridor run through dense residential neighborhoods in the North Easton Village area. Many homes, commercial and historical properties are immediately adjacent to the ROW or in very close proximity. Further, since the de-activation of the old rail line, new homes have been constructed in close proximity to the abandoned ROW. In order to fully understand and mitigate for noise and vibration impacts, we request the FEIR/FEIS include the following:

- Identify all properties that will be impacted by the noise and vibration generated by the train. The list of impacted areas in the DEIR/DEIS is missing several streets and individual properties.
- Create a baseline assessment of existing historic structures; follow-up with a 5-year assessment to determine if there are vibration impacts
- No whistles at grade crossings
- Provide more detail on the likelihood of freight service, including the hours of operation and potential cargo
- Sound barriers and fences in accordance with Federal guidelines

Open Space and Land Acquisition

Table 4.10-16 summarizes the Potential Direct Effects to Protected Open Spaces and ACECs. This table shows no impact in Easton. However, tables 4.10-9, and figures 4.10-7 (a-e) indicate acquisition of Easton public conservation land. We request that the FEIR/FEIS include the following:

- Clarify whether Easton conservation land is intended to be acquired and if so the amount to be acquired.
- Land in an equal amount and of equal ecological value should be provided in exchange for the acquisition.

Natural Resources

The DEIR/DEIS states that the Department of Conservation and Recreation describes the Hockomock Swamp ACEC as one of the most extensive inland wildlife habitats in southeastern Massachusetts and includes outstanding Atlantic white cedar swamp and acidic fen wetland communities. The Hockomock Swamp also provides habitat for at least 13 species listed with the NHESP and is listed in the South Coast Rail Corridor Plan as a Priority Protection Area. The DEIS/DEIR identifies a number of direct and indirect impacts that expected from construction activities, restoration of the rail bed and increasing the canopy bed over the rail bed. The impacts would include hydrological changes; habitat and population fragmentation; edge effects; noise and vibration; and restrictions to wildlife movement. Since detailed plans have not been completed, the full impact on habitat and natural resources cannot be fully known. In order to fully understand the impact of the project on habitat and protected species, the FEIR/FEIS needs to include:

- A baseline assessment of habitat value and rare species populations, using the information gathered during the analysis process; follow-up with a five-year study to assess impacts from the rail on those habitat values and species
- Plans that include implementation for appropriate mitigation to restore affected values and populations to baseline conditions

Wetlands

The DEIS/DEIR indicates wetlands were evaluated using GIS data layers, orthophotos, and visual inspections of critical areas and indicates more detailed analysis of resource areas will be done prior to the design process. The DEIS/DEIR acknowledges the method used provides a best guess estimate as to wetlands impacts and that full impacts will be assessed during the design process once the LEDPA has been selected.

- A superseding ORAD, issued by DEP in 2000, confirmed some wetland resources areas within the Easton portion of the ROW. The ORAD stated wetlands not directly adjacent to the ROW would need to be addressed during the Notice of Intent process. Therefore, it is expected that the wetland boundaries will be finalized when the Notice of Intent is filed with the Easton Conservation Commission.
- Wetland alteration or loss within the Easton portion of the rail line will be replicated in Easton at a ratio of 2:1.

Water Resources

The rail line is located immediately adjacent to the Zone I wellhead protection area and is within the Interim Wellhead Protection area and Zone II wellhead protection area of three of the six wells that supply Easton's drinking water. Any adverse impact to these wells could have a devastating effect on the Town's ability to provide an adequate water supply to its residents. Several water bodies within Easton would also be receptors of aerial deposition of diesel exhaust. The FEIR/FEIS should:

- Demonstrate, in detail, how the project will fully comply with Massachusetts Stormwater Management regulations.
- Prohibit the use of herbicides within the Town's Aquifer Protection District.
- Establish a Performance Guarantee against potential releases of Oils or Hazardous Materials that result in the contamination and subsequent disuse of any or all of Easton's drinking water wells. The amount of the guarantee should be equal to the cost of obtaining drinking water from another source (e.g. advancement of new wells; purchase of water from another supplier) and should be increased by an amount annually that reasonably anticipates increases to said cost.
- Provide for a 2-year pre-construction period of water quality testing and analysis to establish baseline conditions of the water bodies that would be receptors of aerial deposition of diesel exhaust. This baseline analysis should be followed by a five-year assessment to determine any impacts.

Conclusion

The Town of Easton is extremely concerned about the potential impacts of the project alternatives within the preferred Stoughton corridor. As noted above, the preferred alternatives will have significant impacts in regards to public safety and to the Town's natural and built environment. The DEIS/DEIR does not provide sufficient information about the potential impacts of the project, nor does it offer specific mitigation measures to help offset these impacts. We believe these issues should be fully addressed and vetted during the public FEIR/FEIS process.

Please feel free to contact me if you have any questions.

Sincerely,

David Colton
Town Administrator

Cc: Ken Kimmell, Commissioner DEP
Karen Adams, U.S. Army Corps of Engineers
Kristina Egan, MassDOT

Senator Brian Joyce
Senator Thomas Kennedy
State Representative Angelo D'Emilia
State Representative Geraldine Creedon
State Representative Christine Canavan
Easton Board of Selectmen
Raynham Selectmen
Stoughton Selectmen