

May 4, 2011

Mr. Alan Anachecka-Nasemann
Army Corps of Engineers
696 Virginia Road
Concord, MA 01742-2754

Secretary Richard K. Sullivan, Jr., EOEEA
100 Cambridge Street, Suite 900
Boston MA 02114
attn.: MEPA Office (Aisling O'Shea)

RE: Comments by SRPEDD on the Draft Environmental Impact Statement on South Coast Rail Released by the U.S. Army Corps of Engineers

Dear Mr. Anachecka-Nasemann and Secretary Sullivan:

The Southeastern Regional Planning and Economic Development District (SRPEDD) voted unanimously on April 27, 2011 to commend the United States Army Corps of Engineers for a thorough and objective analysis of the South Coast Rail Project in the Draft Environmental Impact Statement/Draft Environmental Impact Report dated February, 2011.

SRPEDD supports the analysis in the report of both the transportation and environmental factors associated with the alternatives that were evaluated.

We agree that the Stoughton Route provides the best service to Taunton, Fall River and New Bedford as measured by travel time and ridership. We support the Corps' findings that the operational obstacles associated with both the Attleboro and Rapid Bus Alternative will make these alternatives infeasible. The fact that the Stoughton route is served mostly by trains already in service as opposed to dozens of new trips on an already heavily traveled corridor make the Stoughton alternative the only viable choice from a transportation perspective.

SRPEDD is also in agreement that the Whittenton Alternative through the City of Taunton poses additional operational problems and should not be considered further. Specifically, the large number of grade crossings in Taunton will be unnecessarily disruptive and will add to the travel time, and thus lowering the ridership numbers.

SRPEDD further agrees with the analysis of environmental factors including wetlands, air quality, water resources, etc. and supports the conclusion that the Stoughton route

performed best on the measure of environmental impact. The fact that the Stoughton route follows rail beds that were in use a little over fifty years ago is an obvious factor in minimizing the environmental impact.

We are very familiar with the corridor as it passes through the Hockomock Swamp ACEC and agree with the conclusion that the wetlands impact will be limited, especially if the trestle is constructed. We would further request significant mitigation to repair any degraded areas of the ACEC.

It should be pointed out that there are many factors beyond the project purpose that argue in favor of this project and in favor of the Stoughton Alternative. These factors include the smart growth benefits of this investment and the significant reduction in vehicle miles traveled and subsequent greenhouse gas reductions. The region also anxiously anticipates the projected economic benefits that will be associated with the restoration of commuter rail service to Southeastern Massachusetts.

We believe that based upon the information presented in the DEIS that the Least Environmentally Damaging Practicable Alternative (LEDPA) should be determined to be the Stoughton Alternative. SRPEDD further supports the electric alternative with its lower carbon footprint and faster travel time between South Coast and Boston.

SRPEDD urges the Army Corps and its partners to complete the review and make the determination of the LEDPA as expeditiously as possible. The region has been working on the restoration of commuter rail service for more than two decades and we are anxious for the Corps to complete its review so that MassDOT can proceed with a financial plan and other aspects of this project.

Thank you for the opportunity to comment on this very important regional project.

Sincerely,

Randall H. Kunz, Chair
Southeastern Regional Planning and Economic Development District

Cc: Kristina Egan, MassDOT