



Mass Audubon position on South Coast Rail Project
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Mass Audubon supports commuter rail improvements as an alternative to highway expansion and to reduce transportation-related emissions of greenhouse gases (GHG). We also support “smart growth” that concentrates development on appropriate land close to transit and other infrastructure to preserve habitat, reduce vehicle-miles traveled, and encourage people to live and work in close proximity.

Significant adverse environmental impacts are associated with the South Coast Rail Project alternatives, including impacts to wetlands, streams, rare species and sensitive communities such as Atlantic White Cedar Swamp. The environmental analysis required under federal and state law should include:

- A full range of alternatives including:
 1. The “Middleborough Full” alternative;
 2. A combination of “Middleborough Simple” and “Middleborough Full;” and
 3. The use of the existing highway corridors of Route 24 and 140;
- Benefits and costs that each alternative would provide to the MBTA commuter system including ancillary benefits of some alternatives to the system as a whole (double tracking connection from Boston to Middleborough line) and a comparison to other priority commuter rail system project costs vs. benefits;
- Ridership, reduction in traffic congestion, and other benefits such as air pollution and GHG emissions reductions;
- Demonstration that the preferred alternative complies with all applicable environmental laws and regulations, and that the least environmentally damaging practicable alternative is selected; and
- Costs of mitigation for each alternative.

Scope of Environmental Analysis

The project’s environmental impact assessment should evaluate impacts to wetland resource areas, rare species and other sensitive ecosystems that will be impacted both within and beyond the footprint of project construction, including but not limited to the following:

- Field verification of wetland boundaries, vernal pools, streams and rare species habitat;
- Amount of temporary and permanent alteration to resources and their functions;
- Effects on sensitive wetlands and streams, including changes to flow, temperature and chemical composition;
- Habitat fragmentation effects;
- Secondary growth impacts resulting from increased rates of development in nearby areas and “smart growth” measures to reduce sprawl and protect resources, including commitments for implementation;
- Demonstration that the anticipated impacts are unavoidable, cannot be further minimized, and are adequately mitigated against as required by federal and state law; and
- Effects on the capacity of existing resources to provide adaptation to climate change impacts such as temperature elevation, more frequent droughts and more intense storms. For example, wetlands provide flood control and undeveloped corridors including free-flowing waterways provide opportunity for shifting and migration of natural communities and wildlife populations.

Mass Audubon owns the 1,014 acre Assonet Cedar Swamp Wildlife Sanctuary in the Town of Lakeville. This property abuts the right-of-way for both the New Bedford and Fall River lines in the “Southern Triangle.” It also contains one of the largest stands of Atlantic White Cedar in the Commonwealth. The project analysis should include a full survey of wetland resource areas, rare species and vernal pools along the portions of the line that cross or abut Mass Audubon property and a full evaluation of physical, biological and hydrological impacts and associated mitigation. Mass Audubon requests that it be provided access to field surveys and input into the draft analysis of impacts to Assonet Cedar Swamp.