



June 22, 2012

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RE: Comments on Environmental Assessment/Environmental Impact Evaluation for the New Haven, Hartford, and Springfield High-Speed Intercity Rail Project

Thank you for the opportunity to provide comments on the Environmental Assessment/Environmental Impact Evaluation for the New Haven, Hartford, and Springfield High-Speed Intercity Rail Project (EA/EIE). Tri-State Transportation Campaign advocates for a more environmentally sustainable and balanced transportation system in Connecticut, New York, and New Jersey. We have strongly supported this project in the past and reaffirm that support here.

By increasing service within the corridor to up to 25 daily round trips by 2030, the project will establish a true commuter rail network throughout central Connecticut and lay the groundwork for transit-oriented development (TOD) along the line. The EA/EIS estimates that the new service will replace 1.5 million car trips a year; save 3.5 million gallons of fuel; support active, vibrant communities; and create over 12,000 jobs.

To maximize these benefits, Tri-State urges ConnDOT to pay particular attention to station area planning – specifically, ensuring that planning around stations supports both transit-oriented development and safe, convenient pedestrian and bicycle access to stations. The state and the department have already taken strong steps to support TOD in the corridor, such as awarding TOD Pilot Grants to Hartford, Meriden, New Haven, Windsor, and Windsor Locks. The EA/EIE also points out that the project is consistent with all local and regional plans (except for Windsor’s Plan of Conservation and Development, which calls for a second rail station). While we applaud these steps, we ask the state to go further.

“Transit Village” Program/Transit-Oriented Development

One important way the state could support TOD is to institutionalize the aforementioned pilot program. One model could be New Jersey’s Transit Village program, which allows municipalities which commit to TOD principles to access technical assistance and receive priority for local aid funding from various state agencies.

Connecticut should also issue a statement of policy, executive order, and/or memorandum of understanding which:

- Outlines a framework for interagency coordination on TOD. This framework should designate a team or entity that would have responsibility for assisting municipalities interested in TOD with permitting, accessing state financing programs, and other requirements; and
- Directs existing funding programs to transit-oriented development sites. (Similar to how the Department of Economic and Community Development's brownfields funding programs contain both location criteria and criteria having to do with health, environmental, and economic benefits.)

Within the EA/EIE itself, we believe that the Purpose and Need statement should note that the project supports development consistent with the smart growth principles advocated by Connecticut, Maryland, and Vermont (which are referenced on page ES-21).

Safe Routes to Transit/Bicycle and Pedestrian Access

The EA/EIS notes that all new and reconstructed stations will have "Americans with Disabilities Act (ADA)-accessible routes from the existing sidewalks ... to the boarding platforms," and that "sites will be designed to provide access by bicycle on the station drives and bicycle storage." However, for stations to truly be accessible, there must be safe and convenient pedestrian and cycling routes which link the stations with surrounding neighborhoods.

Transit planners generally assume that people are willing to walk up to ½ mile to rail or rapid transit stations, but multiple studies have shown that this distance varies depending on how safe and pleasant the walking environment is. Providing good bike/pedestrian access to stations will increase the potential market area for transit-oriented development, improve safety around stations, boost ridership, and reduce the need for parking.

For these reasons, ConnDOT should work proactively with municipalities to ensure that safe and convenient access is provided to and from planned stations. One way to incentivize such improvements would be to establish a "Safe Routes to Transit" or similar program which would provide grants to municipalities to improve safe bike and pedestrian access to rail stations.

There are several ways the document could better emphasize the importance of good bike/pedestrian connections. Just as the EA/EIS identifies where the project is consistent with local plans that support TOD, it should identify where pedestrian and cycle access needs improvement. It should also reflect potential bike-sharing programs in New Haven. In April 2012, New Haven [announced](#) that it had applied for funds to operate a bike-sharing system.

Parking Best Practices

In several locations, the project team took care to integrate station parking in ways that support TOD. For example, parking in Meriden and Berlin will be designed to be integrated into those municipalities' TOD plans for the station area. In Windsor, parking appears to be provided in a structure behind planned development which will front on the street. The EA/EIE also notes that ConnDOT will "work with the Town of Enfield and Bigelow Commons' ownership to co-locate a portion of the Enfield Station parking within the Bigelow Commons development; minimize use of riverfront access for parking; and, at the same time, work to minimize adverse effects to access or parking for Bigelow Commons residents."

We commend the project's use of parking best practices such as shared parking and placing parking behind building frontage. The project team should proactively work with municipalities and use the

same strategies at stations where these practices do not appear to have been followed. For example, the proposed North Haven station would be flanked by large surface parking lots despite the fact that, according to the EA/EIE (pg. 91), the station site is “surrounded primarily by commercial, industrial, and high- and medium-density residential uses.”

New commuter and intercity rail service in the New Haven-Hartford-Springfield corridor will provide increased local access and strengthen links between New York City and Hartford and beyond. By taking steps to integrate TOD, parking best practices, and walking and cycling accessibility into the project, ConnDOT and the state can maximize the benefit of this new transportation asset.