

February 28, 2017

Ed DeWitt

Executive Director

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RE: Shining Sea Bikeway Extension Feasibility Study

Dear Mr. Cannon:

The Association to Preserve Cape Cod (APCC) has reviewed the Shining Sea Bikeway Extension Feasibility Study and writes to express our strong support for the concept of creating a bike trail linking the Shining Sea Bikeway in Falmouth with the Cape Cod Canal bike paths in Bourne. We support the report's recommendation that the project move forward to the design phase with the goal of addressing the unresolved issues identified in the report, particularly the project's potential environmental impacts and potential conflicting uses of the existing rail line.

The expansion of an interconnecting bike trail network that provides alternative transportation and recreational opportunities and that accesses mixed use village centers and other desirable destination points is an important component of Cape Cod's regional transportation strategy. The proposed Shining Sea Bikeway extension would be a vital link in such a network. It would produce a number of environmental and community benefits, as identified in the feasibility study, including reduced traffic congestion, reductions in auto emissions, increased energy conservation and the creation of more livable communities.

The project also creates potential opportunities to restore wetland habitats at locations where the bike trail would pass over wetland areas that may be experiencing restricted flow due to undersized culverts or other obstructions. At least one of these locations, Back River, is listed in the Cape Cod Commission's Cape Cod Atlas of Tidally Restricted Salt Marshes.

The feasibility study considers three possible alternatives for the bikeway extension. "Rail-to-trail" includes the replacement of the existing rails with a bike path. "Rail-with-trail" would involve constructing a bike trail that runs parallel to the rail line. "Rail-with-trail with at-grade crossings" would also involve construction of a parallel bike path but some road crossings would be at-grade rather than relying on the construction of new bridges.

Further study of the project should include a thorough analysis of potential environmental impacts, particularly with regard to the "rail-with-trail" alternatives that may necessitate incursion into wetland areas to accommodate a new bike path running parallel to the existing rail line. Some locations described in the study appear physically incapable of accommodating both rail and trail without considerable alteration of the existing site. The feasibility study states that approximately 9,000 linear feet—or 1.7 miles—of the railroad bed lies within a 100-foot buffer area of wetlands and four railroad bridges or culverts pass

over water bodies. If the project moves forward, the preferred design should show how adverse impacts to these wetland resources can be avoided.

The feasibility study also identifies potential conflicts of uses if a rail-to-trail conversion is considered. Joint Base Cape Cod has stated its desire to keep the rail line open in case the line is needed for mobilizing equipment if a national emergency were to occur. There is also discussion of resuming use of the line to haul waste from area towns to the Upper Cape Transfer Station. In addition, Mass Coastal Railroad, which currently holds a lease on the rail line, has expressed an interest in providing a Scenic and Dinner Trail operation along that route.

A Massachusetts Department of Transportation (MassDOT) memo from 12/15/2016 states that it is MassDOT Rail Division's intention to preserve the existing rail line "for future expansion and to provide rail service to existing and future customers" and therefore does not recommend an extension of the bikeway that would interfere with the rail right-of-way. A determination should be made regarding the realistic likelihood that the rail line will be needed for each of the potential future uses described above.

While recognizing the challenges of the above-mentioned conflicts of use as well as the need to fully assess potential environmental impacts, APCC supports the concept of an extension of the Shining Sea Bikeway. If a bikeway extension can be designed that satisfactorily addresses the concerns identified in the feasibility study, such a project would bring significant benefits to the region. We look forward to reviewing further impact analysis and proposed design plans for the project when they become available.

Sincerely,

Ed DeWitt

**Executive Director** 

Don Keeran

**Assistant Director**