



Massachusetts Chapter

December 22, 2014

MEPA Office

Attn: Holly Johnson, EEA# 15028
100 Cambridge Street, Suite 900
Boston, MA 02114

Dear Ms. Johnson:

I am writing on behalf of the Massachusetts Chapter of the Sierra Club as Chair of its Transportation Committee, in response to the South Station Expansion Project Draft Environmental Impact Report (DEIR) recently issued by MassDOT. While there are some aspects of the proposal that we find of merit—most notably, the reopening of the Dorchester Avenue bridge to the public to better link Downtown with South Boston, and the associated rebuilding of the adjacent streetscape and extension of the Harborwalk along Fort Point Channel—we deem the overall project fundamentally flawed by its basic design assumptions, rendering it incapable of providing a permanent solution to the problem of the Station's congestion so long as it remains a stub-end terminal. I attach the Chapter's Resolution on South Station Expansion, passed by our Executive Committee at its May 2014 meeting.

Absent from the DEIR is any recognition that building yet more dead-end tracks into South Station would be, at best, a temporary solution—one that will likely be eclipsed once again by the anticipated growth in passenger traffic. MassDOT should revisit, instead, its long-shelved plans for a direct rail connection between South and North Stations, which would allow for the through running of Amtrak and commuter trains without the wasteful backup moves that are now a major cause of congestion, and without the air and noise pollution at both terminals caused by the idling diesel locomotives.

A DEIS for the Rail Link was completed in June 2003 and immediately dropped by the Romney Administration, citing cost estimates that many of the proponents of the direct rail connection argue were inflated, and ignoring the operational and fiscal benefits of that project. At this time the Massachusetts Transportation Bond Bill includes \$2 million designated for completing work on the North/South Rail Link environmental studies. We contend that these important studies should be completed before any South Station Expansion Project expansion be allowed to proceed.

After a long post-World War II decline that had reduced its capacity from 28 tracks to 10 and brought it perilously close to demolition during the late 1960s, South Station was finally acknowledged as Boston's preeminent ground transportation hub, and its headhouse was restored and rebuilt two decades later. It was then expanded in the mid 1990s with the addition of several tracks and platforms to accommodate new commuter rail services to the South Shore and Worcester, and by construction of the city's new bus station. Currently the Commonwealth is planning to increase yet again the capacity of this busy terminal by taking the South Postal Annex and putting at least seven more tracks on its site, for a total of 20 tracks and 11 platforms. The Commonwealth touts the project as "[a] rare chance to remove a major chokepoint and unlock greater regional mobility and growth." The planned extensions of commuter rail service to Fall River and New Bedford, and expansion of the existing service to Worcester, are being used to drive this project.

In April 2013 the Chapter submitted its comments on MassDOT's recently released Environmental Notification Form (ENF) for the South Station Expansion project. In addition to the proposal's unexamined assumption that the operational problems encountered by a congested, growing terminal could simply be resolved by adding yet more tracks and platforms, we criticized several other aspects of the proposal. A layover yard to store and service train sets would be sited in one of three locations adjacent to heavily populated Boston neighborhoods—Widett Circle between South Boston and the South End, Beacon Park Yard in Allston, or Readville-Yard 2—and trains



Massachusetts Chapter

South Station Expansion DEIS – 12/22/14 – p. 2

would shower yet more fumes and particulates on the city's residents. Abutters to any layover yard would also be subjected to the constant noise of the locomotives, especially from overnight idling during the winter months. We argued that the MBTA should instead reconsider its decision of several years ago not to begin electrifying its commuter rail lines, which would reduce air pollution most particularly near any layover facility and in adjacent neighborhoods that now suffer some of the worst air quality in the Commonwealth.

The DEIR also glosses over the operational issues of a large terminal with many stub-end tracks and limited space for an adequate "throat" of tracks and switches connecting the platforms with the approach tracks from the west and south, and with the Southampton Street yards. Incredibly, it seems to believe that this project will have a negligible—or even slightly beneficial—effect upon the air quality in and around South Station (page 1-10). Yet the "Maximum Build" option for this project would entail construction of several high-rise office and apartment buildings adjacent to and above the site. Already, commuter trains (whose locomotives are pointed away from the terminal) must stop far from the headhouse to avoid concentrating the diesel fumes due to the bus station directly above the tracks, forcing passengers to walk a long distance to and from their trains. The proposed air rights development would likely concentrate pollution in the platform area, making it even worse than the conditions that currently exist in Back Bay Station. Air quality alone might impel electrification, for the sake of the commuters and the surrounding neighborhood.

Similarly, the DEIR's chapter "Response to Comments on the ENF" ignores the substance of the Chapter's criticisms. While it at least acknowledges our observation that the project would have no benefit for travelers coming into Boston from the north, it sidesteps our contention that it would provide at best a temporary benefit to travelers from the south, until the terminal once again becomes congested due to the projected growth of traffic (pages 9-274, 9-275). Also lacking was any acknowledgement of the benefit of having our commuter and passenger rail function as one unified system providing through service from one side of the metropolitan area to the other and allowing the better distribution of passengers throughout the downtown core, particularly if an intermediate commuter rail station is built in the vicinity of State Street. The Rail Link's 2003 DEIS had estimated that it would take about 50,000 cars off the region's highways, also diverting thousands of commuters from our overstressed subway system (especially from the Orange Line).

We believe that a far more responsible approach to expanding South Station would be to put its new platforms underground, allowing the tracks to be extended north at a later date. While the proponents of the present expansion proposal claim it is an "incremental" improvement (page 9-274) and deny that it would preclude later construction of the Rail Link, the high cost of what critics have called a "billion dollar band-aid" might well prevent the Link from ever being built. Regrettably, voters in November voted to repeal the indexing of Massachusetts' gas tax to the rate of inflation, a move that will create an estimated \$1B gap in the Commonwealth's transportation budget over the next decade. That prospect, however, provides us with the opportunity to reevaluate what proposals make economic and operational sense—and which do not. By this standard, the current plan for South Station is severely deficient.

Respectfully submitted,

John Kyper, Transportation Chair
Sierra Club, Massachusetts Chapter
jkyper47@gmail.com

Enclosure



Chapter Resolution on South Station Expansion.

The Massachusetts Chapter of the Sierra Club is opposed to the expansion of South Station as a stub-end terminal as currently proposed. Completely absent from the present plan is any recognition that building yet more dead-end tracks into South Station is, at best, a temporary solution—a “billion dollar band-aid”—that will be eclipsed, once again, by the anticipated growth in rail passenger traffic.

Instead, MassDOT must revisit its long-shelved plans for a direct rail connection between South and North Stations that will allow for the through running of Amtrak and commuter trains, eliminating the wasteful backup moves that are now a major cause of congestion at both terminals. A first step is to build underground station platforms at South Station as Phase 1 of the North-South Rail Link, thereby accommodating service on Amtrak’s electrified Northeast Corridor while allowing the tracks to be extended north at a later date.

The current proposal, moreover, fails to address the issues of greenhouse gas emissions and climate change, the central challenge of our time. We must make bold moves that had heretofore seemed beyond our means, which would maximize reduction of these emissions while creating more efficient transportation options. According to its DEIR Summary written a decade ago, the Rail Link would result in over 55,000 auto trips diverted daily onto public transportation. An expanded South Station *with* a connection to North Station would be more efficient—and less polluting—than the current plan.

Approved by Sierra Club Massachusetts Chapter Executive Committee

May 18, 2014.