



May 25, 2017

Mr. Stephen Woelfel
South Station Expansion Project Manager
Deputy Director, MassDOT Office of Transportation Planning
10 Park Plaza, Suite 4150
Boston, MA 02116

Dear Mr. Woelfel:

Thank you for inviting the Massachusetts Sierra Club to comment on the recently released Draft Environmental Assessment (EA) and Draft Section 4(f) Determination for the South Station Expansion (SSX) project. Unfortunately, this document is a woefully insufficient substitute for what is needed for a proposal of such magnitude; instead, this project merits a *full* Draft Environmental Impact Statement.

We have responded to the SSX on numerous occasions, officially and otherwise, ever since the proposal was first unveiled five years ago. We believe that expanding South Station as a stub end terminal is an expensive, short-term fix that would inevitably fail to provide a permanent solution to the growing congestion and impending gridlock of this vital passenger hub. It would markedly increase the ambient air pollution caused by idling and backing diesel locomotives, as well as the massive operational inefficiency of trains having to change direction at this end of the line. Instead, we have long advocated for construction of the North-South Rail Link (NSRL), which would resolve these shortcomings by providing a through passage of both commuter and long distance trains from one side of metropolitan Boston to the other.

As currently planned, the SSX would cost at least two billion dollars but achieve only a limited, short-term gain, and the capacity problems now affecting South Station would recur in another decade or two. North Station will soon face similar capacity constraints. South Station Expansion would neither accommodate the anticipated growth in MBTA and Amtrak passenger volumes, nor would it alleviate the increasing automotive congestion that paralyzes our highways and undermines the Commonwealth's greenhouse gas reduction goals. It would provide *no* benefits to the gateway communities north of Boston, as Representative Moulton has noted, and only temporary relief for communities to the south. Also, it would require the taking of yet more valuable land for train yards--in South Bay, Allston and Readville--jeopardizing over 700 jobs at Widett Circle and the New Boston Food Market, and discouraging new real estate development in and around the land taken for these yards.

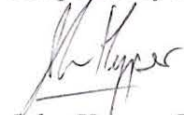
We have criticized previous SSX filings for overstating the benefits of this particular proposal while downplaying its environmental costs to the neighborhoods adjacent to both South Station and the proposed layover facilities, many of which already suffer from some of the worst air quality in the Commonwealth. Now the recently released EA/Draft 4(f) document replicates these deficiencies, while pointedly ignoring any options beyond the required No Build alternative. Unlike MassDOT's previous filings on the SSX, I could not find a single reference to

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the Rail Link proposal in the body of the document--it is only mentioned a couple of times in passing in the MEPA Certificates in the Appendix.

For the reasons outlined above, this filing should be rejected. It is an inadequate, middle-level substitute for the required environmental analysis. Instead, MassDOT must undertake a full and honest Draft Environmental Impact Statement process, one that includes discussion of the NSRL in its Alternatives Analysis--not treat it as a dirty family secret that must never be mentioned in public. We need a comprehensive transportation system for Boston, Massachusetts, and New England. Such a vision for an interconnected rail system in the Commonwealth requires strategic planning--a quality that the current document does not contain.

Respectfully submitted,



John Kyper, Chair
NSRL Subcommittee

Enclosure:

2016-08-15 Sierra Club Massachusetts Chapter on SSX Final Environmental Impact Report



August 5, 2016

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

Dear Ms. Johnson:

Thank you for this opportunity to comment on the Final Environmental Impact Report (FEIR) for the South Station Expansion (SSX) project. After reviewing this document, we would like to share two major concerns: 1) the effects of climate change, and 2) the absence of analysis on how the SSX project would be modified by the construction of the North/South Rail Link (NSRL).

In regard to climate change, the science indicates that the effects are accelerating rapidly. As the SSX is adjacent to Boston Harbor, it is imperative that all planning include not only the latest forecasts for sea-level rise, but also assume that those predictions are likely to be modified upwards very soon. Also, because of the devastating impacts of climate change, we need to move much faster to eliminate fossil-fuel powered travel, especially single-occupant vehicle trips that contribute an outsized share of greenhouse gases.

This climate discussion leads us to the NSRL, which would attract many more riders than the SSX, and ought to be an integral part of the FEIR—yet in this document there is only one mention of the NSRL:

1.5.5. North/South Rail Link Project

MassDOT's draft 2017 – 2021 Capital Investment Plan (CIP) has \$2.0 million programmed for a North/South Rail Link corridor and area planning study. MassDOT continues to commit to expanding South Station in such a way that the goals of the project can be met without eliminating the potential for future underground infrastructure, such as tunnel portals and station locations.

One 'C' in the federally-mandated '3C' planning process is 'comprehensive.' Leaving out the NSRL is not comprehensive planning. How would this proposed SSX, for example, be modified in light of the NSRL? While assurances have been given that the SSX would not preclude the NSRL in the future—and that is crucial—this analysis must include how the two projects affect each other. Is it possible that the NSRL would preclude the need for the SSX? If some expansion of South Station would still be required, would a modified design include other alternatives that you have not yet considered?

The SSX would cost well over a billion dollars and achieve only a limited gain, with the capacity problems now affecting South Station recurring in another decade or two. North Station will soon face similar capacity constraints. The SSX would neither accommodate the anticipated growth in MBTA and Amtrak passenger volumes, nor would it alleviate the increasing automotive congestion that undermines the Commonwealth's greenhouse gas reduction goals. It would provide *no* benefits to the gateway communities north of Boston, as Representative Moulton has noted—and only temporary relief for communities to the south. Also, it would require the taking of yet more valuable land for train yards.

Many of the issues that we and others had identified in the DEIR and in previous MassDOT filings about the SSX are, once again, downplayed in the final document and in the responses to our comments. These include the operational complexities of adding more tracks and platforms to the terminal, particularly the crucial "throat" of the yard where tracks converging from the west and the south must be switched to connect to platforms within a very limited space.


Similarly, the FEIR minimizes the effects on the ambient air quality and noise levels of adding many more polluting diesel locomotives and anticipated increased automotive traffic around the terminal. Another troubling feature is the proposed siting of one or more midday layover yards adjacent to several heavily populated Boston neighborhoods—at Widett Circle, Readville-Yard 2 or Beacon Park Yard—whose nearby residents would risk exposure to increased fumes and particulates. Widett Circle is the most problematic of the three, surrounded by several neighborhoods including South Boston and the South End, with some of the worst air quality in the metropolitan region. While we are assured that pollution will be minimized by plugging in the engines of parked trains to electrical connections to minimize idling, operations often require that engines remain running, particularly during cold weather. A major complaint from Bradford residents on the Haverhill Line concerns fumes and noise from the adjacent layover yard. Given that the layover facilities would be located in urban areas close to many residences, there ought to be mention of MassDOT's plans to electrify the train fleet. What is the schedule, and which lines would be electrified first?

Widett Circle is home to the New Boston Food Market, which contains 21 businesses in the food service and processing industry, employing over 700 people. After the City cleared the meatpacking industry from Faneuil Hall Marketplace half a century ago, these businesses relocated to Widett Circle and the adjacent Newmarket Square due to the area's strategic location beside the Southeast Expressway, and its proximity to downtown. Should these companies be forced to move again, it is very unlikely they could afford to relocate inside Boston. The City, and perhaps the Commonwealth, would lose their payrolls and their tax base.


The Sierra Club has long supported the North-South Rail Link, which would enable through rail service from one side of metropolitan Boston to the other and end the wasteful backup moves that even an expanded stub-end terminal would not. A DEIR for the Rail Link was completed in June 2003 but immediately dropped by the Romney Administration, citing cost estimates that many considered inflated, and ignoring its operational and fiscal benefits. We enclose the Chapter's May 2014 Resolution on South Station Expansion, and a recent letter to Governor Baker after he released \$2 million designated in the Massachusetts Transportation Bond Bill for completing the NSRL environmental studies.

A more fiscally responsible, comprehensive approach to expanding South Station is to put new platforms underground, allowing the tracks to be extended north at a later date. While the proponents of this expansion proposal claim it is an incremental improvement that would not preclude future construction of the NSRL, both the ballooning cost of the SSX and the possibility that the foundation of a new building might interfere with the tunnel right-of-way could well prevent the NSRL from ever being built. The current SSX FEIR process should have included the NSRL as an integral component—not relegated to a two-sentence by-the-way. We need a comprehensive transportation system for Metropolitan Boston, Massachusetts, and New England. That requires comprehensive planning.

Respectfully submitted,


Cathy Ann Buckley
Chair,
Massachusetts Sierra Club

George O'Toole
Chair, Transportation Committee


John Kyper
Chair, NSRL Subcommittee

Enclosures:

May 2014 North-South Rail Link Resolution, Massachusetts Sierra Club Executive Committee
May 27, 2016, letter to Governor Baker

Enclosure #1



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.

Enclosure #2

SIERRA CLUB
MASSACHUSETTS

May 27, 2016

BY U.S. MAIL

The Honorable Charles D. Baker, Jr.
Governor of Massachusetts
Massachusetts State House
Boston, MA 02133

Re: The North-South Rail Link – Better Connections for Boston, Massachusetts, New England

Dear Governor Baker:

We need to recognize a critical issue that the previous administration did not acknowledge when it formulated its plans for the South Station Expansion project (SSX). As currently proposed, the SSX not only fails to fulfill its purported mission, but also precludes a superior alternative and limits a substantial economic opportunity for Boston and the region. For these reasons, the Sierra Club is grateful you are revisiting the proposal for a direct rail connection between North and South Stations.

The Massachusetts Sierra Club believes that the SSX is an unsound investment. It would divert well over a billion dollars to achieve only a short-term gain, and the capacity problems now affecting South Station would simply recur in another decade or two. North Station also faces similar capacity constraints. The SSX would neither accommodate the anticipated growth in MBTA and Amtrak passenger volumes, nor would it alleviate the increasing automotive congestion that undermines the Commonwealth's greenhouse gas (GHG) reduction goals. It would provide *no* benefits to the gateway communities north of Boston, as Congressman Moulton has noted—and only temporary relief for the communities to the south. Also, it would require the taking of yet more valuable land for train yards.

The Sierra Club has long supported the North-South Rail Link (NSRL). Enclosed is the Chapter's Resolution on South Station Expansion, endorsed by our Executive Committee in May 2014. The Commonwealth now has a rare opportunity to create a better transportation system for Boston and New England by linking these two terminals and providing through passenger service. And most importantly, the Rail Link will greatly contribute to MassDOT's GHG reduction requirements under the Global Warming Solutions Act, gradually electrifying the system. This will not only retire polluting diesel locomotives, but also eliminate at least 54,000 daily auto trips.¹

The current SSX stub-end proposal would significantly limit development opportunities around South Station, since much of the land in the area is now consumed by equipment, operations and layovers. The lucrative potential of this area is confirmed by the conversion and development of the nearby former New Haven Railroad Summer Street yards.² The real estate opportunities created by connecting the two terminals could then be leveraged to help finance the project. The NSRL frees up land now dominated by rail for office and residential use, also increasing the value of existing real estate near both stations. The NSRL is much more beneficial than the SSX, and if the SSX were to proceed, the project needs to be one that includes and enhances the NSRL, with platforms underneath South Station that could be extended north at a later date.

¹ "NSRL Major Investment Study / DEIR / Executive Summary." EOE #10270, June 2003, pp. ES-33, 34

² "USPS Site More Valuable Without SSX Than With It," Banker & Tradesman, January 17, 2016

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With the NSRL, commuter and Amtrak trains running through instead of standing by will greatly reduce air and noise pollution from idling diesel locomotives and eliminate congestion caused by wasteful backup moves. Labor productivity will be increased substantially by elimination of the existing 30-minute turnaround time for trains at each terminal. The serious commuting overload on the Green and Orange lines will be reduced by more efficiently distributing riders throughout downtown, as well as by enabling many to walk to their destinations. Eliminating the need to transfer to the subway system will make the commuter trip more convenient and will attract substantially more riders.

The NSRL will also support statewide and regional rail integration and cooperation with current extension plans in New Hampshire, Maine and Vermont. Building on the work of the Federal Railroad Administration's current *NEC Future*³ study, it will knit together Massachusetts and Northern New England, extending Amtrak's Northeast Corridor electrified service beyond Boston, and attracting commerce and tourism throughout Massachusetts. With the newly inaugurated "Heart-to-Hub" service between Worcester and Boston as well as Amtrak service in western Massachusetts, the entire Commonwealth will enjoy much improved rail connections.

Thank you for your recent decision to use the \$2 million designated by the General Court for the NSRL in the current Massachusetts Transportation Bond Bill. We look forward to working with Secretary Pollack to help ensure that the work scope is comprehensive, and to the eventual completion and publication of all required environmental documents for this project.

The Commonwealth's constrained fiscal circumstances, the need to reduce greenhouse gases, the delays and congestion endured by our commuters, and our neighboring states' new regional transportation plans together demand greater vision and more effective use of resources than a stub-end expansion could ever provide.

Thank you.

Sincerely,



Cathy Ann Buckley
Chair, Massachusetts Chapter



John Kyper
Chair, North-South Rail Link Subcommittee

Enclosure:

May 2014 North-South Rail Link Resolution, Massachusetts Sierra Club Executive Committee

cc: Hon. Martin J. Walsh, Mayor of Boston
Hon. Stephanie Pollack, Secretary & Chief Executive Officer of the Department of Transportation
Hon. Matthew A. Beaton, Secretary, Executive Office of Energy and Environmental Affairs
Hon. Members of the 189th General Court of the Commonwealth of Massachusetts (by email)

³ <http://www.necfuture.com>