



October 19, 2018

Mr. Scott Hamwey
Project Manager
Massachusetts Department of Transportation
10 Park Plaza
Boston, MA 02116

Re: NSRL Draft Report Public Comment

Dear Mr. Hamwey:

On behalf of our over 130,000 members and supporters across the Commonwealth, the Sierra Club Massachusetts Chapter provides these comments on the North South Rail Link (NSRL) Feasibility Reassessment Draft Final Report. The Sierra Club has long supported the NSRL, believing that its economic and environmental benefits would far exceed the costs of building this project. The NSRL would transform the transportation system for Boston and New England. Providing through passenger service from one side of the urban region to the other would better serve existing residents and promote growth. Boston is the only city in the East that does not have a through station. We should be inspired by Philadelphia, which joined their stations in 1986.

First, the Rail Link would take cars off metropolitan Boston's overcrowded highways (an estimated 55,000 according to the project's June 2003 Draft Environmental Impact Report's Major Investment study). The Link would reduce the serious overload on the Green and Orange lines by more efficiently distributing riders throughout downtown, as well as by enabling many of them to walk directly to their destinations. Eliminating the need to transfer to the subway system would make the commuter trip more convenient and attract more riders. The Rail Link would greatly reduce air and noise pollution from idling diesel locomotives at both Stations, eliminating the congestion and existing 30-minute turnaround time for trains. NSRL will help us achieve our greenhouse gas goals.

Six years ago, MassDOT unveiled its ambitious and expensive plan to expand South Station from 13 tracks to 20, to relieve the growing congestion and accommodate the anticipated growth in commuter and long-distance train ridership. Unfortunately, however, South Station Expansion (SSX) is a plan of limited vision, as this facility would remain a dead-end terminal and it would again suffer from growing congestion in another couple of decades—just as it has following its previous track and platform expansion in the early 1990s. Unlike the NSRL, SSX would require the construction or expansion of mid-day layover yards at Widett Circle, Allston and Readville to accommodate the train sets, where diesel locomotives would spew their fumes and particulates upon several adjacent neighborhoods with some of the worst air quality in the Commonwealth.

In early 2017 MassDOT commissioned the global engineering firm Arup to undertake the NSRL Feasibility Reassessment study in response to continuing criticism of its SSX proposal and repeated calls for a serious reexamination of the Rail Link. The study's budget of only \$1.5 million limited the focus principally to the project's costs while neglecting many potential benefits. Only one of the three promised public meetings were held before the results of the study were announced in July 2018. Two months later the Draft Final Report was released to the public.

The key sentence in the study is: “Advances in tunnel technology and tunneling experience suggest that a large-bore tunnel alignment through the center of Downtown Boston is feasible” (p. 68). However, the basic thrust of the Report seeks to undermine this conclusion by overstating its costs and minimizing its benefits.

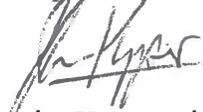
The Report estimates the cost of the project and places its final price tag between \$12 billion and \$22.5 billion (in 2028 dollars). By contrast, a study done last year by the Rappaport Institute at the Harvard Kennedy School estimates that it would cost \$3.8 billion for a two-track option and \$5.9 billion for four tracks (in 2025 dollars).

There are additional grounds to question the presentation of its cost estimates and assessment of the environmental benefits in the Draft Report:

- Costs of normal improvements to the commuter rail system like double tracking, purchase of new equipment and electrification are all added to drive up the bottom line.
- The Report skimps on the required “No Build” option in its analysis of alternatives, ignoring the millions of dollars currently spent in non-revenue service dead heading trains in and out of the two terminals, or the environmental costs of the ambient diesel pollution.
- Future service projections anticipate running trains at peak hour frequencies throughout the day—whether or not demand warrants—resulting in many empty trains, a wasteful use of crews and equipment.
- Section 7.6 on page 145, “Air Quality Benefits,” contains a flawed and simplistic analysis of greenhouse gas (GHG) emissions, seemingly skewed to create a disingenuous view of the project’s benefits. The table accompanying this section would have us believe that taking a vehicle off the road would result in a 1:1 wash on the GHG benefits simply due to the increased service need to carry a passenger on a train—something that is debatable at best.
- Similarly, other benefits of the Rail Link are downplayed, including automobile traffic diverted from highways to transit, the value of the land close to downtown that will no longer be required for the layover of trains that can instead be sold for commercial development, and transit-oriented development due to the joining of the two rail divisions.
- The geographic scope is limited by not including South Coast service (p. 19), and the region outside of Massachusetts (Providence, gateway cities such as Pawtucket).
- The four-track option includes Central Station, which is an optional element (p. 128).

We would like to request that MassDOT call a public hearing on the Report. We call on the administration to commit to building the NSRL and develop a plan than does this is the most economical and rapid way possible, while preserving future expansion options.

Respectfully submitted,



John Kyper and Clint Richmond
Co-Chairs, Transportation Committee
Sierra Club Massachusetts Chapter