

**U.S. Department of Transportation  
Federal Railroad Administration**

**FINDING OF NO SIGNIFICANT IMPACT  
and  
Section 4(f) Determination**

**South Station Expansion Project  
Boston, Massachusetts**

**INTRODUCTION**

The Federal Railroad Administration (FRA), in conjunction with the Massachusetts Department of Transportation (MassDOT), the Massachusetts Bay Transportation Authority (MBTA), and the National Railroad Passenger Corporation (Amtrak),<sup>1</sup> is studying the expansion of South Station Rail Terminal capacity, improving service reliability, and providing related layover capacity to meet current and future (2035) high-speed, intercity, and commuter rail service needs. The South Station Expansion (SSX) project would benefit MBTA Commuter Rail service and Amtrak service along the entire Northeast Corridor (NEC). Project components (in order of the proposed construction sequence) include:

- **Acquire and Demolish the United States Postal Service (USPS) Facility:** Includes acquiring the USPS property and demolishing the USPS General Mail Facility (GMF) located on Dorchester Avenue adjacent to South Station, which would provide an approximately 14-acre site on which to expand South Station.
- **Reopen Dorchester Avenue and Extend the Harborwalk:** Restores approximately 0.5 miles of Dorchester Avenue (which is currently closed off for USPS operations only) for public use and for station access, and reconnects Summer Street to the South Boston area. Includes landscaping and improved pedestrian and cycling connections and facilities, including adjacent sidewalks and crosswalks, and construction of a 0.5-mile extension of the Harborwalk.
- **Expand the South Station Terminal:** Includes adding seven new tracks and four platforms for a total of 20 tracks and 11 platforms; reconfiguring several existing tracks and platforms; upgrading existing rail infrastructure, including interlockings; adding an expanded headhouse; and adding a mid-platform elevated concourse.
- **Construct Rail Layover Facilities:** Provides layover space by constructing a new facility at Widett Circle and expanding the existing Readville – Yard 2 MBTA layover facility to meet layover facility program needs and operational requirements.

FRA awarded a grant in 2011 under its High Speed Intercity Passenger Rail Program (HSIPR) to complete state and federal environmental reviews and preliminary engineering for the SSX project. The Massachusetts Environmental Policy Act (MEPA) environmental review process for this project concluded with the issuance of a final Certificate on August 12, 2016, on the Final Environmental Impact Report (FEIR). As of the date of this FONSI, no federal or state funding has been identified for construction of the SSX project. FRA, the federal lead agency, and MassDOT, the local project sponsor, jointly prepared and released an Environmental Assessment (EA) and Section 4(f) Determination in April 2017 to determine

---

<sup>1</sup> FRA is the federal lead agency. MassDOT is the local project sponsor, assisting FRA with the planning and environmental review of the project. The MBTA is responsible for operating most of the public transportation in the Greater Boston Region, including owning and operating the South Side commuter rail system out of South Station. MBTA will be responsible for implementing some of the mitigation commitments, as identified in Table 2. Amtrak is a railroad operator that provides hourly high-speed intercity rail service in and out of South Station. All existing 13 South Station tracks are fully used by Amtrak and the MBTA, and both operators are limited in their ability to increase service or offer new services due to the constrained size and configuration of the station and terminal facilities.

potential environmental impacts of expanding South Station Rail Terminal capacity and related layover capacity to meet current and anticipated future (2035) high-speed, intercity, and commuter rail service needs. The EA identified a No Build Alternative and a Build Alternative; provided an assessment of effects on the natural and built environment for both the No Build Alternative and Build Alternative; and identified measures to avoid, minimize, or mitigate any negative effects. FRA and MassDOT used a horizon year of 2035 and an approximate opening year of 2025 for analysis of the SSX project. The USPS, the Federal Transit Administration (FTA), the Federal Highway Administration (FHWA), and Amtrak participated in the review of the draft EA as Cooperating Agencies. The EA was circulated for public review and comment between April 26 and May 27, 2017. FRA is making this Finding of No Significant Impact (FONSI) based on the information in the EA in compliance with the National Environmental Policy Act of 1969 (42 U.S.C. § 4321) (NEPA), FRA's Procedures for Considering Environmental Impacts (64 Federal Register 28545, May 26, 1999), and other related laws.

The final version of the EA, Final Section 4(f) Determination, and FONSI are available to the public on FRA's website at <https://www.fra.dot.gov/Page/P0993> and MassDOT's website at <http://www.mass.gov/massdot/southstationexpansion>

## PURPOSE AND NEED

The purpose of the SSX project is to expand South Station Rail Terminal capacity and related layover capacity to meet current and anticipated future (2035) high-speed, intercity, and commuter rail service needs that will:

- Enable growth in passenger rail transportation along the NEC and within the Commonwealth of Massachusetts;
- Improve service reliability through updates to rail infrastructure and related layover capacity;
- Improve the passenger capacity and experience of using South Station;
- Promote city-building in a key area of Boston; and
- Allow for Dorchester Avenue to be reopened for public use and enjoyment for the first time in decades.

There are three fundamental transportation deficiencies (system needs) that the project intends to address to improve both current and future railroad operations:

- **Terminal capacity constraints:** South Station today has fewer than half the original number of tracks that were available when the station first opened in 1899, but it continues to serve as the most heavily used passenger rail facility in New England.
- **Inadequate station facilities:** South Station's passenger facilities, including platforms, waiting areas, and customer support services, do not meet preferred standards for passenger transit facilities.
- **Insufficient layover space:** Additional midday vehicle layover capacity for the MBTA's south side commuter rail service area is needed to allow the commuter rail system to expand in the future.

## ALTERNATIVES

MassDOT and FRA analyzed two alternatives in the EA, a Build Alternative and a No Build Alternative.

### Alternatives Development Process

In order to develop alternatives that could address the project purpose and need, MassDOT and FRA (sometimes referred to as the Project Team) divided the Proposed Action into five major elements:

- Station headhouse;
- Rail;
- Layover;
- Joint development;<sup>2</sup> and
- Roadway.

The Project Team developed a separate set of alternatives for each of the five elements and conducted a screening process for each set of alternatives, dismissing those alternatives that were not reasonable or feasible, and identifying those alternatives that would best meet the goals of the project, while being compatible with other project elements. The Project Team evaluated the alternatives for each element using criteria and principles specific to that element. The Team then identified an alternative for each project element, that best met the needs of the project, and incorporated it into a comprehensive Build Alternative for the project, which then advanced to the EA for full environmental evaluation. Below is a brief description of the alternatives considered for each project element during the alternatives analysis process:

- **Station Headhouse Alternatives: Conceptual design** – MassDOT established a series of design principles for the South Station headhouse expansion, addressing planning and urban design, station architecture, access and connectivity, and historic preservation. Initial unconstrained concepts included expanding the South Station footprint to include the entire USPS GMF site and 245 Summer Street, as well as relocating or altering the South Station Air Rights (SSAR) project.<sup>3</sup>
- **Rail Alternatives: Track configuration and platform** – Simulation tests showed that 20 station tracks represent the optimal number for an expanded station.<sup>4</sup> As part of the SSX project, MassDOT considered four unconstrained and four constrained terminal track configuration rail alternatives,<sup>5</sup>

---

<sup>2</sup> Joint development is non-transportation related development located in the remainder of the land acquired from the USPS that would not be occupied by the transportation infrastructure proposed as part of the SSX project. The program or type of development was not specified as part of the SSX project.

<sup>3</sup> Prior to the expansion of South Station, MassDOT anticipates that the site will include the planned South Station Air Rights (SSAR) project, consisting of approximately 1.8 million square feet of mixed-use development to be located directly above the railroad tracks and the existing South Station headhouse. The SSAR project would also include expansion of the existing Bus Terminal towards the existing headhouse. The SSAR project was reviewed by the Massachusetts Secretary of the Executive Office of Energy and Environmental Affairs (EEA) in 2006. Although it has not yet begun construction, the SSX project assumes the SSAR project as an existing condition and as part of the SSX project's No Build Alternative. Coordination between MassDOT and the SSAR project proponent will continue as engineering and design of each project advances. Construction of the SSAR project is anticipated to commence in 2018.

<sup>4</sup> Massachusetts Department of Transportation. *Boston South Station HSIPR Expansion Project, Technical Memorandum: Network Simulation Analysis of Proposed 2030 MBTA/Amtrak Operations at South Station. Final Report.* August 1, 2010. [http://www.massdot.state.ma.us/Portals/25/Docs/FRA\\_HSIPR/Appendix\\_A1.pdf](http://www.massdot.state.ma.us/Portals/25/Docs/FRA_HSIPR/Appendix_A1.pdf).

<sup>5</sup> Unconstrained rail alternatives are not limited by the property lines of the existing South Station and USPS property and/or constitute a complete demolition and rebuild of the South Station Terminal track area to capture all potential operational benefits. Constrained rail alternatives focused improvements within the boundaries of the existing South Station and USPS property. With the unconstrained rail alternatives, FRA and MassDOT explored opportunities outside of the original study area. Although the unconstrained rail alternatives could help achieve the project goals, they had substantial impacts to major infrastructure adjacent to and within the terminal. The costs associated with the unconstrained rail alternatives outweighed the operational benefits gained, and the Project Team then analyzed rail alternatives within a more defined boundary, the constrained rail alternatives. The constrained rail alternatives did not extend beyond the South Station/USPS property lines and did not impact adjacent

advancing two of the constrained alternatives through an initial screening analysis. The two constrained alternatives were similar within the Terminal track area and differed mostly at the Tower 1 Interlocking. A further screening analysis resulted in the selection of constrained Rail Alternative 3 to advance as part of the Build Alternative. Rail Alternative 3 would largely maintain the existing platform configuration while adding new tracks and platforms parallel to the existing ones to allow for maximum platform accessibility for incoming trains. This alternative accommodates the projected rail service forecasts for 2035, minimizes disruptions to existing operations, and minimizes the level of reconstruction of the existing infrastructure within the Terminal.

- **Layover Alternatives: Layover facilities** – MassDOT conducted a comprehensive alternatives analysis to identify potential locations to meet midday layover needs for the MBTA’s south side commuter rail services. MassDOT identified and evaluated 28 alternatives in a tiered screening process. MassDOT determined that scenarios that maximized the use of the Widett Circle and Beacon Park Yard (BPY) sites, in combination with additional capacity at the MBTA’s existing Readville – Yard 2 facility, would provide the greatest capacity and operational flexibility when compared to other options.<sup>6</sup> All three sites are critical to addressing the short-term and long-term midday layover needs. As part of the Build Alternative, MassDOT selected Widett Circle and an expanded Readville – Yard 2 to advance in this EA to support future expansion of the Terminal. MassDOT will consider design alternatives within the MEPA and NEPA processes for a reconfigured and expanded layover space at BPY in the I-90 Allston Interchange project (I-90 project).<sup>7</sup> As part of the I-90 project, adjustments to the I-90 interchange would likely require reconfiguration of the conceptual BPY layover area designs. MassDOT’s decision to separate the BPY layover site from the SSX project and include it in the I-90 project was done both to provide a more focused discussion of impacts in the affected community surrounding BPY and because the I-90 project, including the construction of the BPY layover facility, is expected to advance to construction prior to South Station. Although the NEPA class of action has not been formally identified, MassDOT anticipates that the I-90 project, including BPY, will be reviewed as an EA and led by the Federal Highway Administration (FHWA).
- **Joint Development Alternatives** – MassDOT considered various joint development scenarios for South Station. Although MassDOT did not select a Build Alternative with joint development, the design of the expanded headhouse and terminal will not preclude, and to the extent practicable, will support private transit-oriented development in the future.
- **Roadway Alternatives** – MassDOT analyzed two roadway alternatives, both of which included the restoration of Dorchester Avenue, its connection to Summer Street, landscaping, and improved pedestrian and cycling connections and facilities. The first alternative included a 100-foot wide cross section, while the second included an 80-foot wide cross section. MassDOT selected the 100-foot wide cross section for further evaluation as part of the Build Alternative.

FRA is advancing the NEC FUTURE program concurrent and in coordination with the SSX project. FRA is currently working with NEC stakeholders to develop a long-range, integrated investment plan for the NEC between Washington, D.C., and Boston, Massachusetts. The purpose of the NEC FUTURE program is to create a vision for the NEC that upgrades aging infrastructure and improves the reliability, capacity, connectivity, performance, and resiliency of future passenger rail service on the NEC for both intercity and regional trips, while promoting environmental sustainability and continued economic growth. Through the

---

infrastructure, including: I-90 vent tunnel building, interstate highway access ramps, South Station bus terminal, or the SSAR project. FRA and MassDOT analyzed a total of four constrained rail alternatives to minimize impacts to the existing infrastructure while still improving operations to and from the terminal.

<sup>6</sup> A detailed layover facility site alternatives analysis is included in Appendix C of the Massachusetts Department of Transportation, South Station Expansion, *Environmental Notification Form*, March 2013. <https://www.massdot.state.ma.us/southstationexpansion/Documents.aspx>

<sup>7</sup> The I-90 Allston Interchange project (I-90 project) site includes the I-90 interchange, land owned by Harvard University, former CSX rail yard, and an intermodal terminal known as Beacon Park Yard, as well as the MBTA’s Framingham/Worcester branch of the MBTA’s commuter rail line.

NEC FUTURE program, FRA identified and analyzed a broad program of service and infrastructure improvements documented in the Tier 1 EIS. FRA released the Record of Decision in July 2017, which documents the selected alternative to be implemented, and a Service Development Plan (SDP), which provides additional details on the business case and phasing plan for implementing the selected alternative.

The SSX project will not preclude the improvements proposed by the NEC FUTURE program; rather, the SSX project includes investments that can later be leveraged by MassDOT and FRA to initiate the additional improvements proposed by the NEC FUTURE program to accommodate service levels beyond 2035. The selected alternative FRA identified in the Tier 1 Record of Decision for the NEC FUTURE program (see [www.necfuture.com](http://www.necfuture.com) for the NEC FUTURE Record of Decision) will be implemented incrementally and in coordination with the phasing of the SSX project. MassDOT will continue to work with FRA to accommodate the projected service and any additional infrastructure improvements included in the NEC FUTURE selected alternative.

### **Build Alternative**

In summary, the Build Alternative includes the following:

- **Acquire and Demolish the United States Postal Service (USPS) Facility:** Includes acquiring the USPS property and demolishing the USPS General Mail Facility (GMF) located on Dorchester Avenue adjacent to South Station, which would provide an approximately 14-acre site on which to expand South Station.
- **Reopen Dorchester Avenue and Extend the Harborwalk:** Restores approximately 0.5 miles of Dorchester Avenue (which is currently closed off for USPS operations only) for public use and for station access, and reconnects Summer Street to the South Boston area. Includes landscaping and improved pedestrian and cycling connections and facilities, including adjacent sidewalks and crosswalks, and construction of a 0.5-mile extension of the Harborwalk.
- **Expand the South Station Terminal:** Includes adding seven new tracks and four platforms for a total of 20 tracks and 11 platforms; reconfiguring several existing tracks and platforms; upgrading existing rail infrastructure, including interlockings; adding an expanded headhouse; and adding a mid-platform elevated concourse.
- **Construct Rail Layover Facilities:** Provides layover space by constructing a new facility at Widett Circle and expanding the existing Readville – Yard 2 MBTA layover facility to meet layover facility program needs and operational requirements.

### **No Build Alternative**

The No Build Alternative consists of the existing transportation facilities and services and all future funded transportation improvement projects in the vicinity of South Station. It represents the base condition against which the Build Alternative is measured. In the No Build Alternative, South Station would remain as it currently exists, with the exception of activities conducted as part of the MBTA's State of Good Repair (SGR) program. Prior to the expansion of South Station, the EA assumes that the site will include the planned South Station Air Rights (SSAR) project, consisting of approximately 1.8 million sf of mixed-use development located directly above the railroad tracks at the existing South Station headhouse. The SSAR project will also include expansion of the existing Bus Terminal towards the existing headhouse. The SSAR project has not yet begun construction. Nonetheless, for environmental review of the SSX project, the SSAR project is assumed to be built for the future year analysis, and is part of the SSX project's No Build Alternative.

## ENVIRONMENTAL CONSEQUENCES

Environmental effects of the Build Alternative for each resource category are summarized in Table 1. All feasible measures were incorporated to first avoid and then minimize any impacts. The EA did not evaluate environmental resources that are not present within the study area, including threatened and endangered species, use of natural resources (other than energy), and ecological systems.<sup>8</sup> Environmental enhancement measures (for example, the implementation of sustainable design measures, efficiency measures, pedestrian and bicycle amenities, etc.) are proposed to further minimize impacts. As reported in the EA, FRA consulted with the U.S. Fish and Wildlife Service and National Marine Fisheries Service in accordance with the U.S. Endangered Species Act (16 U.S.C. 1531-1543) and Section 7 requirements at 16 U.S.C. 1536.<sup>9</sup> Agency correspondence is provided in Appendix C of the EA.

**Table 1 — Environmental Resources and Potential Impacts**

Environmental Resource	Potential Impacts of the Build Alternative
Air Quality	<ul style="list-style-type: none"> <li>• <i>All Sites:</i> No significant impacts. Reduces carbon dioxide (CO<sub>2</sub>) emissions from locomotives idling at South Station. Increases CO<sub>2</sub> emissions from other mobile sources (such as motor vehicles, intercity buses) locally. Beneficial regional impact on CO<sub>2</sub> emissions due to mode shift from automobile trips to transit. Small increases in pollutant emissions in the vicinity of South Station or the layover facility sites would not lead to exceedances of the National Ambient Air Quality Standards (NAAQS) and Massachusetts Ambient Air Quality Standards (MAAQS), and no adverse air quality impacts are expected as a result of the project.</li> </ul>
Noise and Vibration	<ul style="list-style-type: none"> <li>• <i>South Station:</i> No vibration impacts. Prior to mitigation, moderate noise impact projected at 245 Summer Street and to sensitive noise receptors across the Fort Point Channel (at Necco Street) due to removal of noise buffering USPS facility.</li> <li>• <i>Widett Circle:</i> No noise or vibration impacts.</li> <li>• <i>Readville – Yard 2:</i> No vibration impacts. Prior to mitigation, moderate noise impact projected along Wolcott Street and Wingate Road, and Riley Road and Sierra Road.</li> </ul>
Water Resources and Water Quality	<ul style="list-style-type: none"> <li>• <i>All Sites:</i> No significant impacts. Improves water quality by removing approximately 80% of total suspended solids.</li> <li>• <i>South Station:</i> Would reduce net impervious cover by 6.8 acres, reducing peak flow rates and peak runoff volumes, and increasing groundwater recharge volume. Would increase water use and wastewater generation.</li> <li>• <i>Widett Circle:</i> Would reduce net impervious cover by 14.7 acres, reducing peak flow rates and peak runoff volumes. Would reduce water use and wastewater generation.</li> <li>• <i>Readville – Yard 2:</i> Would increase net impervious cover by 2.0 acres of new pavement. Prior to mitigation, would increase peak flow rates and runoff volumes. Minor increase in water use and wastewater generation.</li> </ul>
Wetlands	<ul style="list-style-type: none"> <li>• <i>South Station:</i> No direct wetland impacts. Non-significant resource impacts include land subject to coastal storm flowage (2.9 acres) and coastal bank (700 linear feet) due to raising a depressed section of the seawall, and include impacts to 100-foot jurisdictional buffer zone to coastal bank (7.9 acres).</li> </ul>

<sup>8</sup> Additional information is provided in Massachusetts Department of Transportation, South Station Expansion Project. *Draft Environmental Impact Report, Appendix 5, Natural Resources Technical Report*. October 2014. Available at: <http://www.massdot.state.ma.us/southstationexpansion/Documents/DEIR.aspx>

<sup>9</sup> U.S. Endangered Species Act (16 U.S.C. 1531-1543), Section 7 requirements at 16 U.S.C. 1536, December 1973. Accessed October 2012. <http://epw.senate.gov/esa73.pdf>.

Environmental Resource	Potential Impacts of the Build Alternative
	<ul style="list-style-type: none"> <li>• <i>Widett Circle</i>: No impacts.</li> <li>• <i>Readville – Yard 2</i>: Non-significant resource impacts include riverfront area (0.01 acres), five isolated vegetated wetlands (0.6 acres),<sup>10</sup> and buffer zone to Neponset River bank (0.3 acres).</li> </ul>
Floodplains and Sea Level Rise	<ul style="list-style-type: none"> <li>• <i>All Sites</i>: No significant impacts. No impacts to flood storage capacity.</li> <li>• <i>South Station</i>: Subject to flooding from 1% annual chance (100-year, zone AE) flood event with 3.2 feet of sea level rise by the year 2070. Raising a portion of Fort Point Channel Seawall helps to mitigate flooding from projected 2 feet of sea level rise by the year 2050.</li> <li>• <i>Widett Circle</i>: Subject to flooding from 1% annual chance flood event with 3.2 feet of sea level rise by the year 2070.</li> <li>• <i>Readville – Yard 2</i>: Not located within flood hazard areas.</li> </ul>
Waterways and Coastal Zone Management	<ul style="list-style-type: none"> <li>• <i>All Sites</i>: No impacts to Wild and Scenic Rivers. The Project has been designed to be consistent with policies and procedures with the federal Coastal Zone Management (CZM) program as implemented through the Massachusetts CZM program, as revised. If a United States Army Corps of Engineers (USACE) Section 404 Permit is required, a formal CZM consistency determination will be sought.</li> <li>• <i>South Station</i>: Within the Massachusetts Coastal Zone. Expands existing transportation infrastructure in filled tidelands. Replaces a nonwater-dependent use with publicly accessible development, transportation infrastructure, and open space. Per M.G.L. Chapter 91, requires new non-water dependent infrastructure license and Public Benefit Determination.</li> <li>• <i>Widett Circle</i>: Within the Massachusetts Coastal Zone. Contains small area of filled landlocked tidelands (not subject to Chapter 91 licensing). Per M.G.L. Chapter 91, requires Public Benefit Determination.</li> <li>• <i>Readville – Yard 2</i>: Not located within coastal zone.</li> </ul>
Energy and Greenhouse Gas Emissions	<ul style="list-style-type: none"> <li>• <i>All sites</i>: No significant impacts. At South Station Terminal, stationary-source GHG emissions increase from expanded facilities, but emissions are minimized through improved and more energy efficient HVAC and lighting. For the SSX project as a whole, direct transportation-related GHG emissions increase based on expected increases to the number of train and bus trips, and increases in local automobile traffic related to expanded service at South Station and the re-opening of Dorchester Avenue. These increases in direct transportation-related GHG emissions are minimized through decreased auto congestion and decreased locomotive idling time (both near South Station Terminal and at layover facilities, where locomotive idling is replaced by more efficient electric plug-ins). Regional GHG emissions are reduced based on increases in travel mode shift from car to train (as a result of expanded services at South Station).</li> </ul>
Aesthetics and Design Quality	<ul style="list-style-type: none"> <li>• <i>South Station</i>: No significant impacts. Improves the viewshed along Dorchester Avenue and from across the Fort Point Channel through the removal of the USPS facility and introduction of landscaping, pedestrian and cycling facilities, and the expanded headhouse. Does not impact other views as the height of the proposed structures is lower than existing structures. Includes a headhouse expansion with a prominent entrance along Dorchester Avenue that respects the primary historic entry at Dewey Square.</li> <li>• <i>Widett Circle and Readville – Yard 2</i>: No significant impacts.</li> </ul>

<sup>10</sup> MassDOT will consult with the United States Army Corps of Engineers (USACE) as design advances to determine whether the five isolated wetlands fall under jurisdiction of Section 404 of the Clean Water Act.

Environmental Resource	Potential Impacts of the Build Alternative
Transportation	<ul style="list-style-type: none"> <li>• <i>South Station</i>: No significant impacts. Improves capacity to accommodate increased ridership. Improves pedestrian circulation and enhances the pedestrian experience. The reopening of Dorchester Avenue would link South Boston and the Financial District and would relieve traffic congestion along Atlantic Avenue. Improves bicycle infrastructure. Improves or retains Level of Service (LOS) at most impacted intersections; decreases LOS at three intersections.</li> <li>• <i>Widett Circle and Readville – Yard 2</i>: Increases midday layover capacity for MBTA’s south side operations. No significant impacts.</li> </ul>
Possible Barriers to Handicapped and Elderly	<ul style="list-style-type: none"> <li>• <i>South Station</i>: Creates integrated station for patrons and enhances access for the elderly and handicapped. Complies with the Americans with Disabilities Act (ADA) of 1990 and Massachusetts Architectural Access Board (MAAB) regulations. Provides adequate space and appropriate facilities to safely and conveniently manage the projected peak-hour pedestrian demand. Complies with current egress capacity and travel distance requirements.</li> <li>• <i>Widett Circle and Readville – Yard 2</i>: Layover facilities are not open for public access; but will be designed in accordance with MBTA policy regarding employee accessibility.</li> </ul>
Land Use and Zoning	<ul style="list-style-type: none"> <li>• <i>All Sites</i>: The project is consistent with local zoning and other local planning and development plans.</li> <li>• <i>South Station</i>: Requires acquisition of the USPS property<sup>11</sup> (14 acres) that includes right-of-way (5.0 acres) to reopen Dorchester Avenue for public access. Requires acquisition of a parcel adjacent to 245 Summer Street (0.2 acres) to accommodate intersection of Dorchester Avenue and Summer Street.</li> <li>• <i>Widett Circle</i>: Requires acquisition of Cold Storage and New Boston Food Market properties (25.1 acres), and Foodmart Road and Widett Circle (6.2 acres). May require acquisition of a small portion of Department of Public Works facility property (0.1 acres).</li> <li>• <i>Readville – Yard 2</i>: Requires partial acquisition of land owned by James G. Grant Co. LLC (0.7 acres).</li> </ul>
Socioeconomic	<ul style="list-style-type: none"> <li>• <i>All Sites</i>: Property acquisitions and relocations will comply with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, 42 USC 4601; CFR 49 Part 24 and/or Massachusetts General Law (M.G.L.) 79A through the MBTA’s real estate acquisition team. Fair market values will be paid for property acquisitions.</li> <li>• <i>South Station</i>: Results in the relocation of approximately 1,000 USPS jobs. Provides approximately 200 new permanent jobs at South Station. Supports the continued economic growth and expansion of the Downtown Financial District and adjoining South Boston Waterfront/Innovation District.</li> <li>• <i>Widett Circle</i>: Displaces approximately 30 private businesses currently operating at the layover facility site.</li> <li>• <i>Readville – Yard 2</i>: Requires partial acquisition of land owned by James G. Grant Co. LLC (0.7 acres).</li> </ul>
Environmental Justice	<ul style="list-style-type: none"> <li>• <i>All Sites</i>: No disproportionate impacts to EJ populations.</li> </ul>

<sup>11</sup> As described in the EA, the SSX project involves acquisition and demolition of the USPS GMF located on Dorchester Avenue adjacent to South Station, which would provide an approximately 14-acre site on which to expand South Station. Although demolition of the USPS facility after it is vacated is part of the project, the relocation of USPS operations is not part of the project. For the purposes of the indirect and cumulative impact analysis, FRA and MassDOT assumed that the USPS GMF could be relocated to a site in South Boston on the Reserved Channel in Boston’s Seaport District (Figure 1 of EA Appendix B) that the USPS had previously identified as potentially being appropriate to accommodate a relocated USPS GMF. The USPS would determine the future location(s) to which its operations would be relocated, and the relocation would be subject to its own environmental review as required by state and federal regulations as a separate project. The actual relocation of the USPS GMF would be subject to negotiations between the USPS and MassDOT/Commonwealth of Massachusetts.

Environmental Resource	Potential Impacts of the Build Alternative
	<ul style="list-style-type: none"> <li>• <i>South Station:</i> Benefits environmental justice (EJ) populations that use the station by providing improved transportation facilities and additional areas of open space, including the new Harborwalk on Dorchester Avenue.</li> </ul>
Public Health and Safety	<ul style="list-style-type: none"> <li>• <i>South Station:</i> Improves passenger, traffic, pedestrian, and bicycle safety. Minimizes surveillance problems (such as dark or obscure areas) by increasing open areas and lines of sight and improving lighting. Prior to construction, further investigation would be required to identify the presence, location, and quantity of suspect Asbestos-Containing Materials (ACM) and potential hazardous materials.</li> <li>• <i>Widett Circle:</i> No significant issues associated with historic releases anticipated during project construction. Prior to construction, further investigation will confirm any ACM and potential hazardous materials.</li> <li>• <i>Readville – Yard 2:</i> Likely some contamination would be encountered during project construction. Prior to construction, further investigation will identify any ACM and potential hazardous materials.</li> </ul>
Parks and Recreational Areas	<ul style="list-style-type: none"> <li>• <i>All Sites:</i> Has no adverse impacts on parks and recreation areas in the vicinity of the project sites.</li> <li>• <i>South Station:</i> Provides significant benefits and recreational opportunities associated with reopening Dorchester Avenue, including a cycle track, Harborwalk extension, and increased access to the Rolling Bridge Park and the Fort Point Channel waterfront.</li> <li>• <i>Widett Circle and Readville – Yard 2:</i> No impacts.</li> </ul>
Cultural Resources/ Section 106	<ul style="list-style-type: none"> <li>• <i>All Sites:</i> No archaeologically sensitive sites.</li> <li>• <i>South Station:</i> Raising a 700-foot section of the Fort Point Channel Seawall (a contributing structure to the Fort Point Channel Historic District) will help mitigate flooding from projected 2 feet sea level rise by the year 2050. Improves views to and from the Fort Point Channel Historic District. The State Historic Preservation Officer (SHPO) concurred with FRA’s finding of <i>Conditional No Adverse Effect</i>.</li> <li>• <i>Widett Circle and Readville – Yard 2:</i> No impacts.</li> </ul>
Construction Period Impacts	<ul style="list-style-type: none"> <li>• <i>All Sites:</i> No significant construction impacts.</li> <li>• <i>South Station:</i> Provides temporary construction jobs. May impact wetland resource areas. Construction phasing may require schedule adjustments to rail service. Potential exposure to contaminated soils, debris, or groundwater during construction. May cause temporary dust emissions, direct emissions, noise, and vibration from construction equipment, and indirect emissions from vehicles. May temporarily disrupt traffic and increase congestion.</li> <li>• <i>Widett Circle:</i> Potential exposure to contaminated soils, debris, or groundwater during construction. May temporarily impact rail service. May cause temporary dust emissions, direct emissions, noise, and vibration from construction equipment, and indirect emissions from vehicles.</li> <li>• <i>Readville – Yard 2:</i> Potential exposure to contaminated soils, debris, or groundwater during construction. Construction access may temporarily impact wetland resource areas. May cause temporary dust emissions, direct emissions, noise, and vibration from construction equipment, and indirect emissions from vehicles.</li> </ul>
Indirect and Cumulative Effects	<ul style="list-style-type: none"> <li>• <i>South Station:</i> No significant indirect or cumulative effects. Relocates the USPS facility from Dorchester Avenue to a new location (potentially a site in South Boston on the Reserved Channel). Provides positive indirect effects on social and economic conditions by enhancing accessibility for residents, workers, and tourists within and beyond the Downtown Boston area. By improving rail service frequency, supports continued economic development and job and population growth, including the projected total buildout of the South Boston Waterfront/Innovation District planned by the City of</li> </ul>

Environmental Resource	Potential Impacts of the Build Alternative
	<p>Boston. The reopening of Dorchester Avenue would also link South Boston and the Financial District and would relieve traffic congestion along Atlantic Avenue. With the SSX project, FRA’s NEC FUTURE program, as defined in the EA Chapter 1, could be initiated, along with other south side commuter rail improvements planned by Amtrak and MBTA.</p> <ul style="list-style-type: none"> <li>• <i>Widett Circle and Readville – Yard 2</i>: No significant indirect or cumulative effects.</li> </ul>

**SECTION 4(f) DETERMINATION**

The Build Alternative would not use any parks and recreation areas protected by Section 4(f) of the U.S. Department of Transportation Act of 1966 (49 U.S.C. §303 and 23 U.S.C. §138). FRA has determined that the project, implemented with noise mitigation and designed consistent with historic preservation design principles, would have no adverse effect on historic properties, and therefore would result in no Section 4(f) use except for the modification of the seawall, which would have a *de minimis* impact.

Section 4(f) prohibits FRA from allowing a transportation project to use the land of a historic site of national, state, or local significance, unless (1) there is no prudent and feasible alternative to using that land and the project includes all possible planning to minimize harm to the historic site; or (2) FRA determines that the project will have a *de minimis* impact on the historic site. See 49 U.S.C. § 303(c), (d). For historic sites, a *de minimis* impact finding may be made when the U.S. DOT agency has determined that no historic property will be affected by the project or that the project will have “no adverse effect” on historic properties as defined in Section 106 of the National Historic Preservation Act. In making this determination, FRA considers the views of the parties participating in Section 106 consultation, and the SHPO has to concur in writing. FRA finds that impacts to the seawall would be *de minimis*. The SHPO, the Massachusetts Historical Commission (MHC), concurred with FRA’s finding and proposed conditions in a letter dated May 9, 2017. In a letter dated June 20, 2017, the U.S. Department of the Interior also concurred with FRA’s *de minimis* finding, and stated the agency had no comments on the Draft EA or the Section 4(f) Evaluation. MassDOT will implement all minimization measures included in MHC’s concurrence letter as a condition of implementing the SSX project (see Table 2). The full analysis and minimization measures are further discussed in Attachment 1.

**PUBLIC AND AGENCY COORDINATION**

MassDOT maintained consistent communication with residents, public officials, businesses, property owners, stakeholders, and regulatory agencies throughout the environmental process. The SSX project received public input throughout the planning process to plan and develop the project in coordination with a range of interests. Stakeholders include transit passengers; community and business groups in abutting neighborhoods; pedestrians and bicyclists; and city, state, and federal government agencies. The USPS, FTA, FHWA, and Amtrak participated in the review of the EA as Cooperating Agencies.

Methods for engaging the public included holding public information meetings, open houses and briefings; outreach efforts to EJ and Title VI populations; a project website; email and print notices; brochures, fact sheets, surveys, and presentations; social media postings; technical coordination meetings; and regional media publications. The project’s Public Involvement Plan lays out specific strategies for implementing MassDOT’s outreach goals. MassDOT continues to implement its public outreach program outlined in the Public Involvement Plan, which is provided along with all other project documents on the project website at: <http://www.mass.gov/massdot/southstationexpansion>

The Project Team circulated the Draft EA for public review and comment between April 26 and May 27, 2017. MassDOT distributed copies of the Draft EA to local libraries, federal and state agencies, and local governments. The document remains available on FRA's website at <https://www.fra.dot.gov/Page/P0993> and MassDOT's website at <http://www.mass.gov/massdot/southstationexpansion>

Thirty (30) comment letters were submitted by members of the public, local government officials, and agencies. No comments required revision to the EA. Seven commenters were in general support of the SSX project. Letters received from the agencies were in favor of or neutral to the project. No letters were received from current elected officials; some letters were received from former elected officials. A number of commenters were in favor of the North South Rail Link project, which is the subject of a separate feasibility study by MassDOT currently underway.<sup>12</sup> Some comments were received from adjacent property owners or businesses at South Station, Widett Circle and Readville – Yard 2, and the potential relocation site for the USPS. Some public comments were about matters outside the scope of the NEPA analysis conducted for SSX. Certain comments requested an additional level of analysis or design that FRA and MassDOT determined not to be warranted or appropriate for this assessment of environmental impacts. The Project Team received no requests for a public hearing. The Project Team incorporated comments received on the Draft EA into this FONSI, as applicable. The original comment correspondence, as well as a summary of comments and associated responses, is provided in Attachment 3.

## **COMMITMENTS AND MITIGATION MEASURES**

Currently, FRA and MassDOT have not identified funding for construction of the SSX project. FRA and MassDOT have identified environmental mitigation measures to meet FRA requirements in the event FRA funding is provided for construction of the project. If FRA funding were used to construct the project, FRA would require MassDOT (or another entity), as the project sponsor, to implement all commitments and mitigation measures specified in the EA and this FONSI, as well as comply with all applicable federal, state, and local permitting requirements during the implementation of the project. Table 2 outlines the environmental commitments and mitigation measures that reduce adverse impacts, to which FRA and MassDOT/MBTA have committed in the EA and FONSI if FRA were to provide funding for construction of the project, as well as in the Final Environmental Impact Report (June 2016) prepared to comply with the requirements of Massachusetts General Laws, Chapter 30, Section 61, and in accordance with the MEPA regulations at 301 CMR 11.07(6)(k). These commitments are also memorialized in the August 2016 MEPA Certificate for the project. MassDOT/MBTA will revise the mitigation measures as the project progresses to final design, and MassDOT/MBTA will prepare and submit final Section 61 findings to state and federal agencies, as appropriate, to assist in permit applications.

---

<sup>12</sup> The North South Rail Link project feasibility study, currently underway by MassDOT, is not federally funded and therefore not subject to the NEPA process.

**Table 2 — Summary of Project Commitments and Mitigation Measures**

Environmental Resource	Proposed Commitments and Mitigation Measures
Air Quality	<ul style="list-style-type: none"> <li>No mitigation recommended.</li> </ul>
Noise and Vibration	<ul style="list-style-type: none"> <li><i>South Station</i>: Construction of an approximately 1,450-foot long, 18-foot high noise barrier, extending along the easternmost track.</li> <li><i>Widett Circle</i>: No mitigation recommended.</li> <li><i>Readville – Yard 2</i>: Extension of the existing berm/noise barrier at Readville – Yard 2 to approximately 800 feet long and 18 feet high.</li> </ul>
Water Resources and Water Quality	<ul style="list-style-type: none"> <li>Stormwater Best Management Practices (BMPs) will mitigate changes in stormwater peak flow rates, runoff volumes, groundwater recharge volumes, and water quality, and limit impact from construction and operation on nearby water bodies.</li> <li>Water efficiency measures will be incorporated. An Infiltration and Inflow (I/I) plan will be developed to mitigate for increased wastewater flows at South Station. Agency specific coordination will be continued as part of final design.</li> <li>Site-specific Stormwater Pollution Prevention Plans (SWPPPs) and Operation and Maintenance (O&amp;M) plans will be prepared.</li> </ul>
Wetlands	<ul style="list-style-type: none"> <li><i>South Station</i>: Work will comply with appropriate performance standards and any conditions required by the Boston Conservation Commission.</li> <li><i>Widett Circle</i>: No mitigation recommended.</li> <li><i>Readville – Yard 2</i>: Work will comply with appropriate performance standards and any conditions required by the Boston Conservation Commission. Mitigation (if required) for disturbed wetland impacts to be determined through consultation with USACE.</li> </ul>
Floodplains and Sea Level Rise	<ul style="list-style-type: none"> <li><i>South Station</i>: No mitigation recommended. However, to reduce South Station’s vulnerability to potential future flood events, MassDOT proposes to raise a portion of the seawall to help mitigate projected increase in flooding events and extent by the year 2050. Additional site-specific elements will be implemented to minimize vulnerability to future flooding events. Site-specific elements could include, but are not limited to, adaptation measures such as relocating critical power/heating systems to higher levels, or water-proofing subsurface site elements.</li> <li><i>Widett Circle</i>: Additional adaptation measures (for example, relocating critical power/heating systems to higher levels, or water-proofing subsurface site elements) will be considered to minimize vulnerability to future flooding events.</li> <li><i>Readville – Yard 2</i>: No mitigation recommended.</li> </ul>
Waterways and Coastal Zone Management	<ul style="list-style-type: none"> <li>No mitigation recommended.</li> </ul>
Energy and Greenhouse Gas (GHG) Emissions	<ul style="list-style-type: none"> <li>To further minimize impacts, use of renewable energy, such as solar photovoltaic energy, solar hot water, district energy steam, and electric plug-ins for trains are under consideration by MassDOT/MBTA.</li> </ul>
Aesthetics and Design Quality	<ul style="list-style-type: none"> <li>No mitigation recommended.</li> </ul>
Transportation	<ul style="list-style-type: none"> <li><i>South Station</i>: Roadway, bicycle, and pedestrian improvements will be implemented at eight signalized intersections. No mitigation measures required to address transit system capacity constraints beyond minor schedule adjustments recommended by MassDOT/MBTA for peak period commuter rail service.</li> <li><i>Widett Circle and Readville – Yard 2</i>: No mitigation recommended.</li> </ul>

Environmental Resource	Proposed Commitments and Mitigation Measures
Possible Barriers to Handicapped and Elderly	<ul style="list-style-type: none"> <li>No mitigation recommended.</li> </ul>
Land Use and Zoning	<ul style="list-style-type: none"> <li><i>All Sites:</i> Footprints required to support site functions will be minimized. Property acquisitions and relocations will be conducted in accordance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, 42 USC 4601; 49 CFR Part 24 and/or Massachusetts General Law (M.G.L.) 79A through the MBTA’s real estate acquisition team. Fair market values will be paid for property acquisitions.</li> <li><i>Widett Circle:</i> Impacts to Department of Public Works operations near Widett Circle will be minimized as more detailed survey and design is completed in the next design stage.</li> </ul>
Socioeconomic	<ul style="list-style-type: none"> <li>MassDOT will continue to coordinate with the City of Boston and the businesses in the Widett Circle and Readville – Yard 2 areas through the next phases of project development. MassDOT will also continue coordination with all relevant parties and agencies in advancing the USPS relocation and other relevant transportation improvements in the Waterfront area. As discussed under “Land Use and Zoning,” required relocation assistance and compensation would be provided for affected property owners.</li> </ul>
Environmental Justice	<ul style="list-style-type: none"> <li>No mitigation recommended.</li> </ul>
Public Health and Safety	<ul style="list-style-type: none"> <li>The following will be prepared and implemented: a Safety and Security Program Plan, a Preliminary Hazard Analysis, a Threat and Vulnerability Assessment, a Preliminary Safety and Security Design Criteria Manual, and site-specific Health and Safety Plans.</li> <li>Phase II Environmental Site Assessments will be completed at South Station, Widett Circle, and Readville – Yard 2.</li> <li>Asbestos-Containing Materials (ACM) and hazardous materials will be identified prior to demolition.</li> </ul>
Parks and Recreational Areas	<ul style="list-style-type: none"> <li>No mitigation recommended.</li> </ul>
Cultural Resources/ Section 106	<ul style="list-style-type: none"> <li>Implementation of a Construction Management Plan/Noise Control Plan, including BMPs for noise and vibration control.</li> <li>Construction of a noise barrier at South Station.</li> <li>Rehabilitation of the Fort Point Channel seawall along Dorchester Avenue and expansion of South Station, consistent with the Design Principles for the project, the Secretary of the Interior’s Standards for Rehabilitation and guidelines for new construction.</li> <li>MHC and the other Section 106 consulting parties review of 30% and 60% design plans.</li> </ul>
Construction Period Impacts	<ul style="list-style-type: none"> <li>The following will be prepared and implemented: a construction phasing schedule that balances duration and impact by optimizing overnight work windows, weekend work outages, and strategic track closures; a Construction Management Plan (CMP); a Stormwater Pollution Prevention Plan (SWPPP); a Dust and Emissions Control Plan; a Construction Noise Control Plan; appropriate soil management procedures; and Soil Erosion and Sediment Control measures.</li> <li>MassDOT’s and City of Boston’s specifications for traffic management requirements and work hour provisions will be followed.</li> <li>Vibration levels will be monitored at the project sites during construction and any needed mitigation measures will be facilitated.</li> </ul>

Environmental Resource	Proposed Commitments and Mitigation Measures
	<ul style="list-style-type: none"> <li>• Provisions in the Boston Water and Sewer Commission (BWSC) Stormwater Permit and Massachusetts Water Resources Authority (MWRA) 8(m) Permit will be followed.</li> <li>• Soil erosion and sediment controls for construction activity adjacent to wetland resources will be implemented.</li> <li>• MassDOT/MBTA will prepare an unanticipated discoveries plan prior to construction to address the possibility of encountering previously undocumented archaeological resources during construction.</li> <li>• MassDOT/MBTA will continue to work with all relevant agencies, utilities, and project stakeholders as appropriate agencies to identify necessary permits.</li> <li>• MassDOT/MBTA will continue coordination with Massport throughout design and construction to minimize construction impacts to airspace, and to identify necessary permits.</li> <li>• MassDOT/MBTA will continue to coordinate with MWRA and BWSC during subsequent design phases and will provide data on the existing sewer system performance and sewer model results from existing and proposed (Build) conditions after it has been collected.</li> <li>• MassDOT/MBTA will continue to coordinate with MWRA during subsequent design phases on the I/I plan, particularly with regard to the CSO outfalls in the vicinity of the SSX project. In addition, there are other projects planned in the area that may impact the I/I plan and MassDOT/MBTA will continue coordination with those projects to ensure all future flows are mitigated accordingly.</li> <li>• MassDOT/MBTA will comply with 360 C.M.R. 10.016 (State Sewer Use Code for Gas/Oil Separators), as well as 248 C.M.R 2.00 (State Plumbing Code), and all other applicable laws.</li> <li>• MassDOT/MBTA will contact the Toxic Reduction and Control (TRAC) Department to obtain an inspection for each facility prior to obtaining approval from MWRA and the Local Plumbing Inspector.</li> <li>• MassDOT will continue coordination with all relevant parties and agencies in advancing the USPS relocation and other relevant transportation improvements in the Waterfront area.</li> <li>• MassDOT/MBTA will continue to coordinate with Fidelity Investments throughout the next stages of design to: <ul style="list-style-type: none"> <li>1) review loading dock operations at 245 Summer Street;</li> <li>2) discuss the reopening of Dorchester Avenue and any necessary removal of Fidelity’s patio and adjacent subsurface elements;</li> <li>3) discuss maintaining points of egress during construction;</li> <li>4) discuss design of the noise wall;</li> <li>5) develop a more detailed geotechnical analysis of the South Station and USPS sites; and</li> <li>6) develop a construction management plan (CMP) for the reconstruction of the portion of the seawall along Dorchester Avenue.</li> </ul> </li> <li>• MassDOT/MBTA will continue to coordinate with the City to help realize a future development vision for both South Station and Widett Circle during construction.</li> </ul>

## CONCLUSION

FRA selected the Build Alternative from among several considered alternatives because it best meets the project's Purpose and Need and goals and objectives. The Build Alternative, as analyzed in the EA, would meet the established Purpose and Need of the project by acquiring and demolishing the USPS facility in order to expand South Station Terminal capacity; reopening Dorchester Avenue; and extending the Harborwalk. The Build Alternative would provide related layover capacity in order to meet current and future high-speed, intercity, and commuter rail service needs through 2035. The Build Alternative would enable growth in passenger rail transportation within the Commonwealth of Massachusetts and along the NEC. The Build Alternative will not preclude the improvements proposed by the NEC FUTURE program; rather, the SSX project includes investments that can later be leveraged by MassDOT and FRA to initiate the additional improvements needed by the NEC FUTURE program to accommodate service levels beyond 2035. Expanding the Terminal would improve the passenger experience at South Station, while updating track and signal infrastructure and related layover capacity would improve service reliability and will help prepare the station to accommodate future growth defined in FRA's NEC FUTURE Record of Decision.

FRA finds the project, as presented and assessed in the EA, which is incorporated herein by this reference, satisfies all applicable requirements of FRA's Procedures for Considering Environmental Impacts (64 FR 28545, May 26, 1999) and NEPA (42 USC § 4321 *et seq.*); Council on Environmental Quality (CEQ) regulations (40 CFR parts 1500-1508); Section 4(f) of the Department of Transportation Act (49 U.S.C. § 303(c)); and other related laws. FRA finds that the Build Alternative will have no foreseeable significant impact on the quality of the human or natural environment provided it is implemented in accordance with the commitments identified in this FONSI. MassDOT, or another project sponsor, would be responsible for ensuring all environmental commitments identified in this FONSI are fully implemented if the project is constructed with FRA financial assistance. The EA provides sufficient evidence and analysis for FRA to determine that an environmental impact statement is not required for the project as presented.

  
\_\_\_\_\_  
**Jamie Rennert, Director**  
**Office of Program Delivery**  
**USDOT Federal Railroad Administration**  
**1200 New Jersey Avenue, SE**  
**Washington, DC 20590**

10/27/17  
Date

FRA's Office of Program Delivery, with assistance from FRA's Office of Chief Counsel and MassDOT, prepared this document in September 2017 in accordance with FRA's Procedures for Considering Environmental Impacts and NEPA. For further information regarding this FONSI contact:

Amishi Castelli, Ph.D.  
Environmental Protection Specialist  
U.S. Department of Transportation  
Federal Railroad Administration  
Office of Program Delivery  
Environment and Corridor Planning Division (RPD-13)  
One Bowling Green, Suite 429  
New York, NY 10004-1415

The following organization assisted the Office of Program Delivery in preparing the EA:

Massachusetts Department of Transportation (MassDOT)  
Office of Transportation Planning  
10 Park Plaza, Suite 4150  
Boston, MA 02116

#### **ATTACHMENTS**

- Attachment 1 – Section 4(f) Determination
- Attachment 2 – U.S. Department of the Interior Concurrence Letter
- Attachment 3 – Response to Comments on the Draft EA and Draft Section 4(f) Determination

**Attachment 1**  
**Section 4(f) Determination**

This Page Intentionally Left Blank

## Section 4(f) Determination

---

---

### 1. Introduction

Section 4(f) of the U.S. DOT Act provides protection for publicly owned parks, recreation areas, wildlife and waterfowl refuges, and historic properties or archaeological sites on or eligible for listing on the National Register of Historic Places. This chapter presents the evaluation of the parks and historic resources protected under Section 4(f), addresses potential impacts of the SSX project on these resources, and describes plans to minimize harm. The following analysis demonstrates that the SSX project, implemented with noise mitigation and designed consistent with historic preservation design principles, would have no adverse effect on historic properties, and therefore would either involve no Section 4(f) use or, in the case of the Fort Point Channel seawall, a *de minimis* impact (as defined in Section 3 below).

### 2. Project Overview

The SSX project would expand South Station Terminal capacity and related layover capacity in order to meet current and anticipated future high-speed, intercity, and commuter rail service needs. The project includes planning and preliminary engineering for the following components:

- Acquire and demolish the USPS Facility;
- Reopen Dorchester Avenue and extend the Harborwalk;
- Expand the South Station Terminal; and
- Construct rail layover facilities for storing midday trains at Widett Circle and existing Readville – Yard 2.<sup>1</sup>

Further description of the proposed action is presented in EA Chapter 1 and Chapter 2, while EA Figures 1-1, 1-2, and 1-5, and Figures 2-3 through 2-6 depict the project site.

### 3. Section 4(f) Protections and Definitions

Under Section 4(f) of the U.S. DOT Act of 1966 (49 U.S.C. §303 and 23 U.S.C. §138), U.S. DOT and its modal administrations may approve the use of publicly owned parks, recreation areas, wildlife and waterfowl refuges, or historic sites, only if there is no feasible or practicable alternative to the use of the land and the project includes all possible means to minimize harm resulting from the use. FHWA's Section 4(f) regulations<sup>2</sup> define “use” to include:

- **Permanent Incorporation** into a transportation facility (either by purchase or easement acquisition);
- **Temporary Occupancy**, when there is temporary use of property that is adverse in terms of Section 4(f) preservationist purposes; and

---

<sup>1</sup> FRA has elected to follow FHWA Section 4(f) regulations codified at 23 CFR 774 et seq. for its Section 4(f) analysis, since FRA has not enacted Section 4(f) regulations.

<sup>2</sup> *Ibid.*

- **Constructive Use**, when the proximity impacts (including visual or noise impacts) are so great as to impair the qualities that qualify the property for protection.

A U.S. DOT agency may approve transportation projects if it determines that the use will involve a “*de minimis*” impact. A *de minimis* impact is one that, taking into account avoidance, minimization, and mitigation, results in no adverse effects to the activities, features, or attributes of a park, recreation area, or historic site that qualifies for Section 4(f) protection. A U.S. DOT agency may make a determination of *de minimis* impacts for a use of Section 4(f) property that is minor in nature, as long as the agency coordinates with the officials having jurisdiction over the Section 4(f) property and provides opportunities for public involvement.

For parks and recreation areas, a *de minimis* impact finding may be made for projects that will not adversely affect the features, attributes, or activities qualifying the property for protection under Section 4(f). In making this determination, the public must be afforded an opportunity to comment, and the officials with jurisdiction over the property have to concur in writing.

For historic sites, a *de minimis* impact finding may be made when the U.S. DOT agency has determined that no historic property will be affected by the project or that the project will have “no adverse effect” on historic properties. In making this determination, the views of any parties participating in the Section 106 consultation must be considered, and the State Historic Preservation Officer (SHPO) has to concur in writing.

## **4. Existing Conditions**

### **4.1. Parks and Recreation Areas**

Section 4(f) protects only those publicly owned and accessible areas whose primary purpose is parkland use or public recreation, and that are significant as designated by the officials with jurisdiction. Section 4(f) protection also extends to public walkways and trails that are privately owned but are made publicly accessible through a public easement, but not to walkways or bicycle paths that are part of a transportation facility right-of-way. For example, completed sections of the Harborwalk that border the South Station site to the east along the Fort Point Channel and the Federal Reserve Bank site (Table 1 and Figure 1), as well as the section on the east side of the Fort Point Channel, are protected under Section 4(f).

Table 1 and Figures 1 through Figures 3 identify parks and recreational areas potentially protected under Section 4(f) within one-quarter mile of the project sites.

**Table 1 — Parks and Recreation Areas in the SSX Study Area**

Map ID	Site Name	Facility Type	Ownership
<b>SOUTH STATION</b>			
1	Atlantic Avenue plantings	Malls, Squares, Plazas	State (MBTA)
2	Binford Street Park	Malls, Squares, Plazas	Private
3	Children’s Museum Plaza	Malls, Squares, Plazas	Private
4	Children’s Wharf Harborwalk	Malls, Squares, Plazas	Private
5	Children’s Wharf Park	Parks, Playgrounds, Athletic Field	City
6	Dewey Square Plaza	Malls, Squares, Plazas	State (MassDOT)
7	Federal Reserve Bank Harborwalk	Malls, Squares, Plazas	Private
8	Fort Point Channel Harborwalk	Malls, Squares, Plazas	Private
9	I-90 Interchange	Malls, Squares, Plazas	State
10	Pagoda Park	Parks, Playgrounds, Athletic Field	State (MassDOT)
11	Rolling Bridge Park	Malls, Squares, Plazas	State (MassDOT)
12	Rose Fitzgerald Kennedy Greenway	Malls, Squares, Plazas	State (MassDOT)
13	Russia Wharf Harborwalk	Malls, Squares, Plazas	Private
14	South Bay Harbor Bicycle Trail	Bicycle Trail	Federal/State/ City/ Private
15	Tufts Wharf Harborwalk	Malls, Squares, Plazas	Private
<b>WIDETT CIRCLE</b>			
1	Union Park Street Playground	Parks, Playgrounds, Athletic Fields	City
2	South Bay Harbor Bicycle Trail	Bicycle Trail	Federal/State/ City/Private
<b>READVILLE – YARD 2</b>			
1	Blue Hills State Reservation	Parkways, Reservations, and Beaches	State
2	Iacona/Readville Playground	Parks, Playgrounds, Athletic Field	City
3	Jeremiah Hurley Memorial Park/Wolcott Square	Malls, Squares, and Plazas	City
4	Moynihan Playground	Parks, Playgrounds, Athletic Field	State
5	Neponset River Reservation	Parkways, Reservations, and Beaches	State (MassDCR)
6	Dedham Rail-Trail	Bicycle Trail	State
7	Readville to Neponset Rail -Trail	Bicycle Trail	Private
8	Neponset Extension Rail -Trail	Bicycle Trail	State

Note: Refer to Figure 1 (South Station), Figure 2 (Widett Circle), and Figure 3 (Readville – Yard 2) for numbered locations.  
Source: City of Boston Open Space Plan 2008-2014, MassGIS, MassDOT, MassDCR.

## 4.2. Wildlife and Waterfowl Refuges

Section 4(f) protection extends to wildlife and waterfowl refuges, however none exist in the vicinity of the project sites.

## 4.3. Historic and Archaeological Resources

Table 2 lists the individual properties and historic districts within the South Station APE. The locations of these historic resources are depicted on Figure 4.

The Readville – Yard 2 and Widett Circle APE do not contain historic properties listed, or eligible for listing, in the National or State Register of Historic Places.<sup>3</sup>

Section 4(f) protects archaeological resources that are significant for preservation in place. FRA and MassDOT (the Project Team) have not identified any recorded archaeological sites or sites of archaeological sensitivity in the APEs at the SSX project sites due to the filling and disturbances that have historically occurred at these urbanized sites.<sup>4</sup>

**Table 2 — National Register Listed or Eligible Properties or Districts within the South Station Area of Potential Effect**

Name	Historic Designation/Recommendation
<b>SOUTH STATION</b>	
<b>Properties listed in the National and/or State Registers of Historic Places</b>	
Fort Point Channel Historic District	Listed in National and State Registers
Leather District	Listed in National and State Registers
Russia Wharf Buildings	Listed in National and State Registers
South Station Headhouse	Listed in National and State Registers
Commercial Palace Historic District	Determined National Register Eligible Listed in State Register
Fort Point Channel Landmark District	Listed in State Register (Boston Landmark District)
<b>Properties Determined Eligible for Listing in the National Register of Historic Places</b>	
Chester Guild, Hide and Leather Machine Company	Determined National Register Eligible
Chinatown District	Determined National Register Eligible
Federal Reserve Bank of Boston	Determined National Register Eligible
Kneeland Street Steam Heating Plant	Determined National Register Eligible
South End Industrial Area	Determined National Register Eligible
Weld Building	Determined National Register Eligible
Gillette	Determined National Register Eligible

Source: South Station Expansion Project, *Historic Architectural Resources Technical Report*, March 2016 UPDATE.

<sup>3</sup> Further information is presented in South Station Expansion Project, *Historic Architectural Resources Technical Report*, March 2016 UPDATE.

<sup>4</sup> Further information is presented in South Station Expansion Project, *Draft Environmental Impact Report, Appendix 13 (Part 1), Phase I Archaeological Reconnaissance Survey Technical Report*, October 2014.

South Station Expansion Project  
Section 4(f) Determination

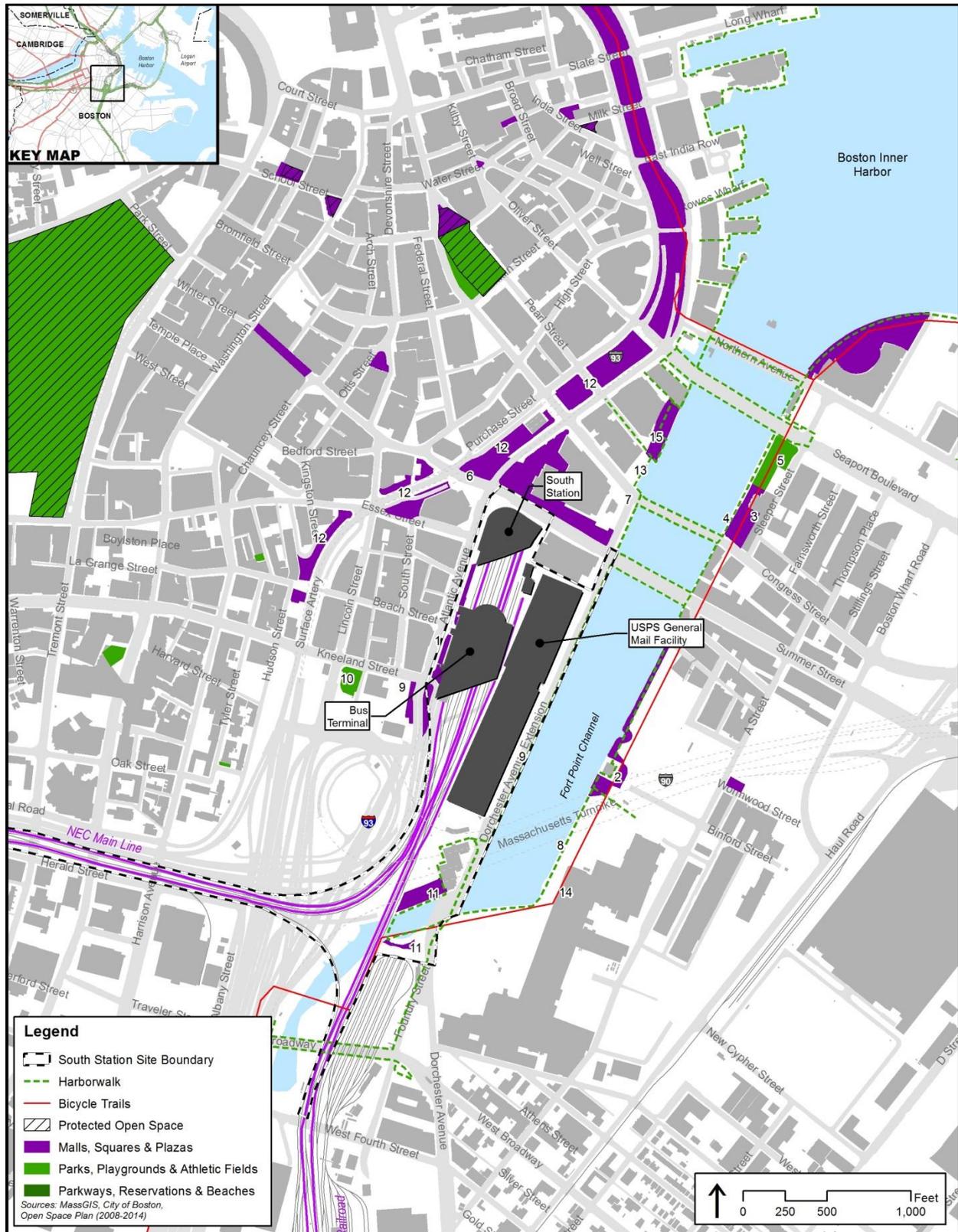


Figure 1 — Potential Section 4(f) Parks and Recreation Areas in the South Station Study Area

South Station Expansion Project  
Section 4(f) Determination

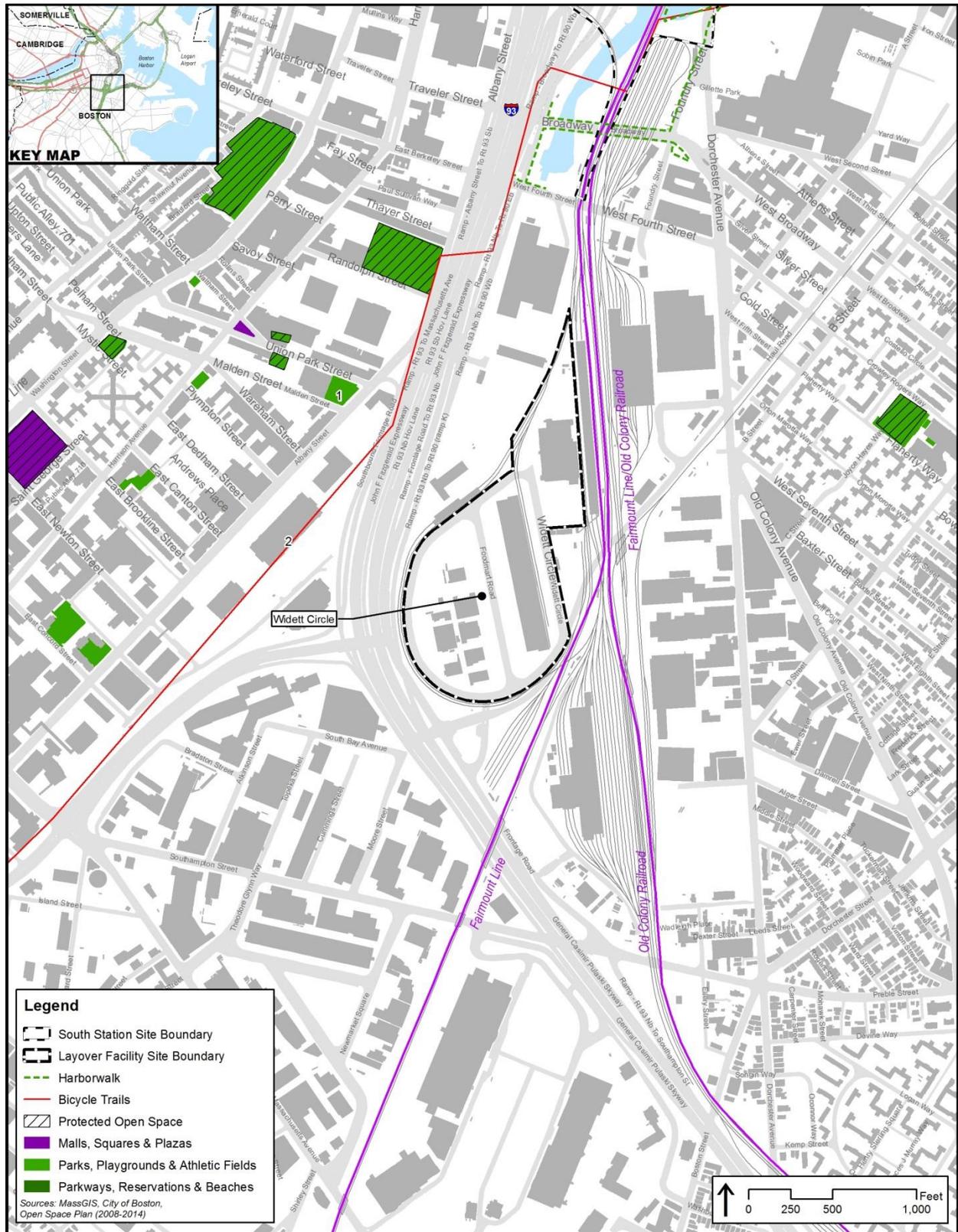


Figure 2 — Potential Section 4(f) Parks and Recreation Areas in the Widett Circle Study Area

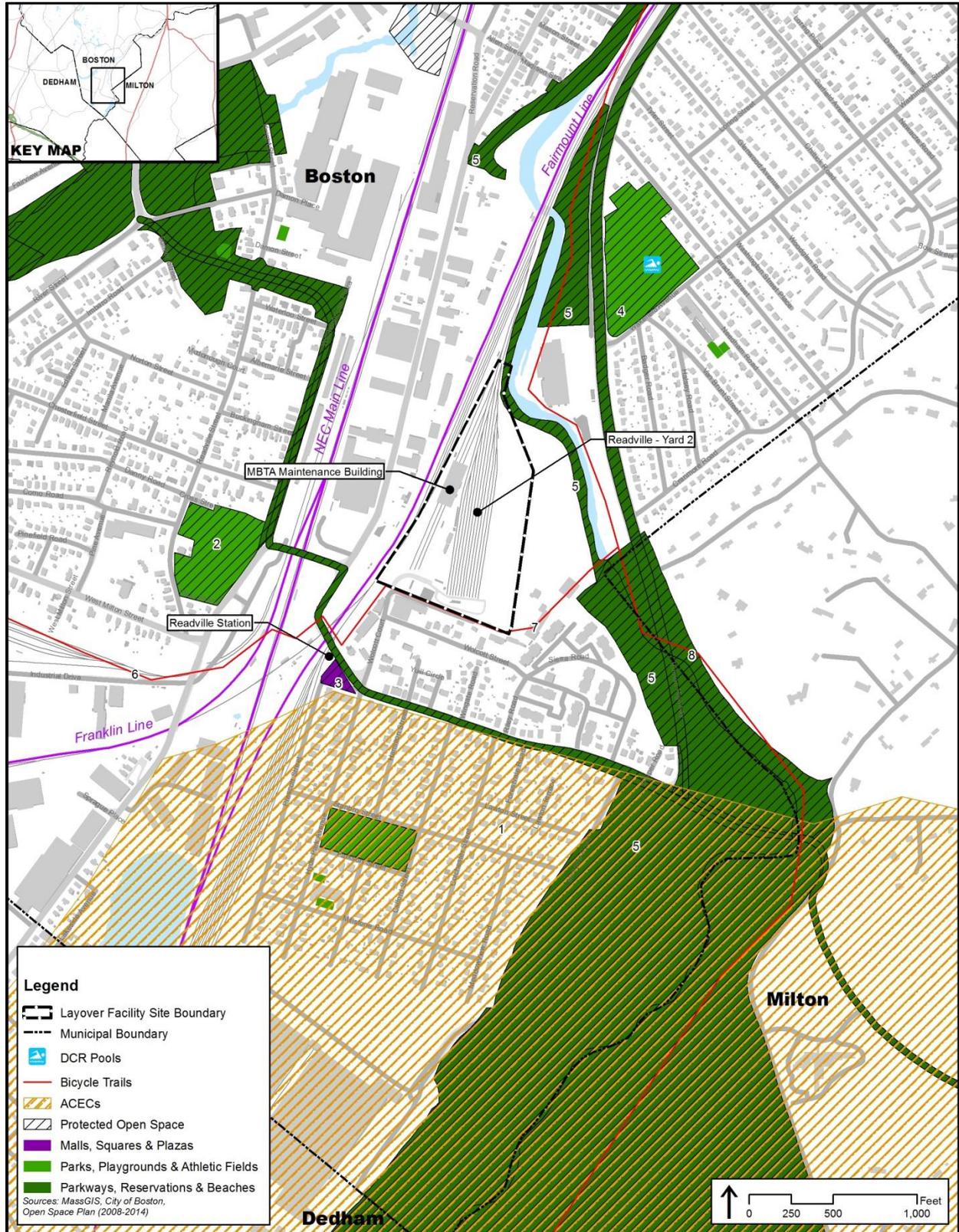


Figure 3 — Potential Section 4(f) Parks and Recreation Areas in the Readville – Yard 2 Study Area

South Station Expansion Project  
Section 4(f) Determination

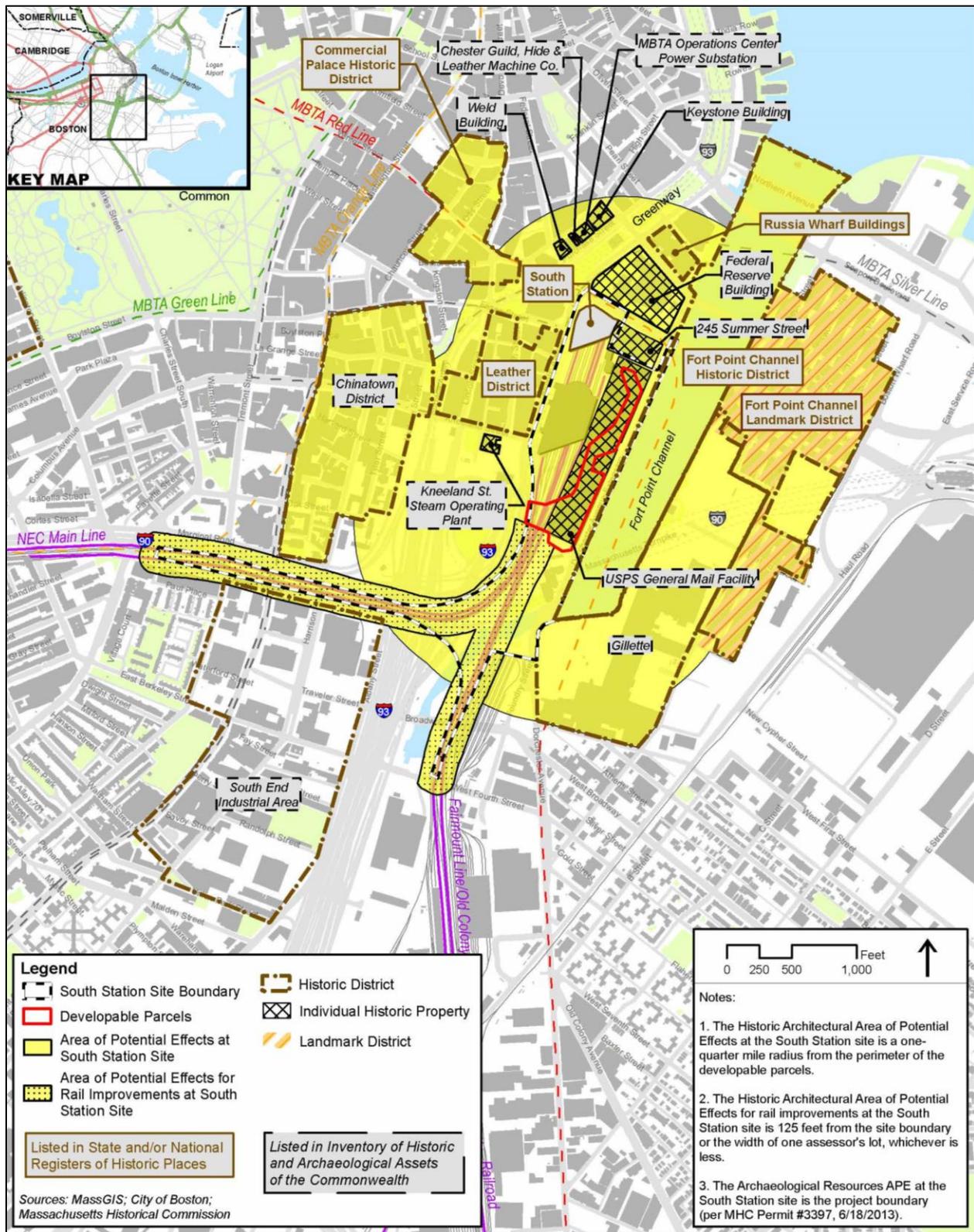


Figure 4 — South Station Historic Architectural Area of Potential Effects

## 5. Potential Impacts to Section 4(f) Resources

The Project Team compared the SSX Build Alternative plans to park, recreation area, and historical site boundaries to determine if the project would require any permanent acquisition or temporary occupancy of land. For determining constructive uses as defined by Section 4(f), the Project Team assessed noise and vibration impacts, access restrictions, and visual impacts to determine if these impacts would constitute a use of the Section 4(f) resource.

### 5.1. Parks and Recreation Areas

FRA has determined that the Build Alternative would not use any parks and recreation areas protected by Section 4(f). The Build Alternative would not require permanent land acquisition or temporary occupancy of any Section 4(f) park or recreation area. Constructive uses of parks and recreation areas occur primarily when there is an increase in noise levels due to the operation and construction of the project.

The parks and recreation areas closest to the South Station site include the Dewey Square Parks, Rolling Bridge Park, and the Fort Point Channel Harborwalk. The South Station building acts as a noise barrier for Dewey Square Parks/Rose Fitzgerald Kennedy Greenway, effectively shielding them from constructive use. The predicted noise levels at the Dewey Square Parks would remain compatible with outdoor recreation in this urban environment and would not be so severe that the activities at the parks would be substantially impaired or constitute a constructive use. Rolling Bridge Park is located approximately 900 feet south of the new tracks, and the Project Team anticipates no noise impacts will occur at this location.

Removal of the USPS facility adjoining South Station would increase noise levels from train operations along the Fort Point Channel Harborwalk on the opposite side of the Fort Point Channel. As mitigation, the Project Team would construct an 18-foot high noise barrier to reduce noise from train operations at the station along the existing and proposed sections of Harborwalk. With this mitigation, the predicted future noise levels in this location would remain compatible with outdoor recreation in this urban environment and would not be so severe that the activities would be substantially impaired or constitute a constructive use of the Harborwalk.

There are no parklands within 500 feet of the Widett Circle layover facility site; therefore, FRA has determined that there would be no Section 4(f) use in this location.

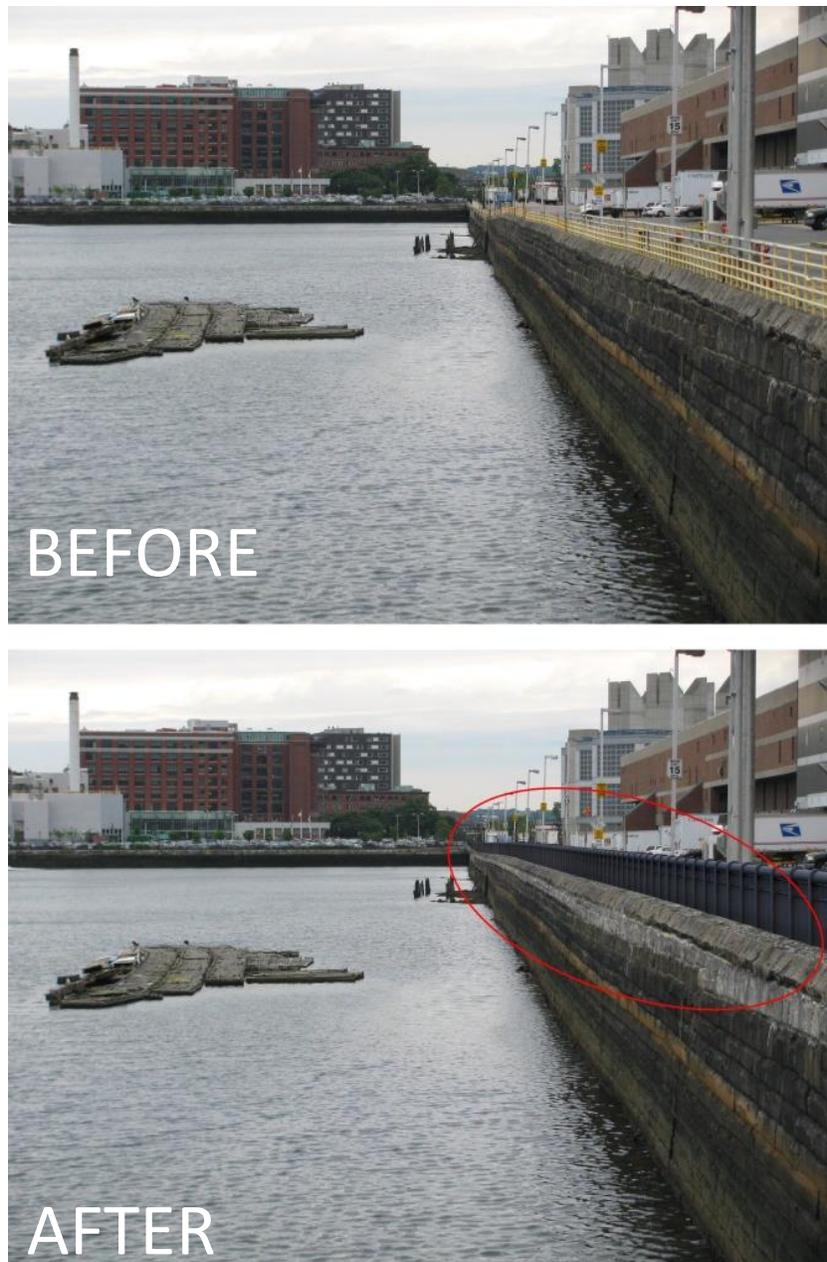
At the expanded Readville – Yard 2 layover facility site, the Massachusetts Department of Conservation and Recreation (MassDCR) Neponset River Reservation borders the northeast corner of the site, but no direct impacts to the Neponset River Reservation would occur. Noise levels from trains traveling along the Neponset River Reservation and into the layover facility would remain similar to existing conditions. With the extension of the existing berm/noise barrier at the Readville – Yard 2, and the distance from the layover facility, noise impacts are not expected to occur at either the MassDCR Neponset River Reservation or the Blue Hills Reservation immediately to the south.

As discussed in EA Chapter 3, there would be no substantive increases in visual impacts or vibration levels at these Section 4(f) parks or recreation areas, and therefore no constructive use of these facilities.

### 5.2. Historic Resources

Project impacts to historic properties include potential construction noise impacts to the South Station headhouse and potential operational noise impacts to the Fort Point Channel Historic District, as further described in the following section. Proposed mitigation measures would effectively eliminate or minimize any potential adverse project impacts.

The SSX project will not result in any direct alteration of the designated historic portions of the South Station headhouse, and the Project Team does not anticipate any temporary construction impacts (i.e., temporary occupancy) of the historic portions of the headhouse. The proposed elevated concourse will connect to the existing facilities at the platform level, outside of the existing headhouse, and no modifications to the interior of the building are currently proposed. The historic South Station headhouse includes the main concourse/waiting room, which was entirely reconstructed and rehabilitated consistent with the *Secretary of the Interior's Standards for Rehabilitation and Illustrated Guidelines for Rehabilitation of Historic Buildings (Standards)* in the mid-1980s as part of the station upgrades by FRA/MBTA.



**Figure 5 — Proposed Seawall Improvements – Before and After (View 1)**

The Fort Point Channel east and west seawalls are contributing structures to the Fort Point Channel Historic District. The Build Alternative includes replacing the existing deteriorated railing to match the section of seawall across Summer Street and raising an approximately 700-foot section of the west seawall along Dorchester Avenue by 1.5 feet to match the elevation of the seawall to the north and south. MassDOT’s proposal to raise the seawall is in response to recent projections of sea level rise of nearly two feet by the year 2050 and would help to mitigate potential flooding on the future South Station site. The raising of a 700-foot section of the Fort Point Channel seawall would be undertaken in a manner that is consistent with the *Standards* and would have no adverse effect on the seawall or the Fort Point Channel Historic District. Figures 5 and 6 provide before and after views of the proposed seawall improvements.



**Figure 6 — Proposed Seawall Improvements – Before and After (View 2)**

Under Section 4(f), FRA and MassDOT have determined that the proposed seawall improvements would have a *de minimis* impact. Replacing the deteriorated railing would enhance preservation of this historic resource and raising the elevation of the seawall represents mitigation to address sea level rise. For historic sites, a *de minimis* determination requires concurrence from the State Historic Preservation Officer (SHPO) and/or Tribal Historic Preservation Officer (THPO): (1) that there is “no adverse effect” or “no historic properties affected” on the historic resource and (2) with the U.S. DOT’s determination that the Section 4(f) use is *de minimis*. U.S. DOT must also consider the views of any consulting parties participating in the Section 106 consultation. The SHPO, the Massachusetts Historical Commission (MHC), concurred with FRA’s finding and proposed conditions in a letter dated May 9, 2017. In a letter dated June 20, 2017, the U.S. Department of the Interior also concurred with FRA’s *de minimis* finding, and stated the agency had no comments on the draft EA or draft Section 4(f) Evaluation.

At the South Station site, the Project Team assessed impacts to historic resources resulting from demolition activity and noise and vibration as discussed below. There are no historic properties within the Widett Circle or Readville – Yard 2 layover facilities sites. Accordingly, FRA does not anticipate any visual, wind, and shadow impacts to historic resources to result from the SSX project.

### **Noise**

The proposed tracks would be located further from the existing headhouse than the existing tracks, which will reduce operating noise in the existing headhouse. In general, the noise from any single train operation, such as an Amtrak locomotive idling in front of the South Station headhouse, would generate the same noise level inside the headhouse for both the existing condition and the Build Alternative. However, the noise from all the trains operating at South Station over a 24-hour period (the Ldn noise level) would decrease because the train noise would be distributed over 20 tracks instead of the existing 13 tracks, with the new tracks located farther from the South Station headhouse. This is true, even accounting for the increase in the number of train operations at South Station between the existing and the future Build

Alternative. Moreover, the historic significance of South Station relates to its use as a transit hub and is not considered to be a quiet historic setting.

Prior to mitigation, a moderate noise impact would be expected to occur at sensitive residential receptors within the Fort Point Channel Historic District due to the removal of the USPS facility. As discussed in Sections 5.1 and 6.1, construction of a noise barrier would significantly reduce noise (10 to 12 dBA) at the Fort Point Channel Historic District, and would extend approximately 1,450 feet, essentially the full length of the USPS facility, to mitigate noise impacts for the entire Fort Point Channel Historic District.

The Ldn noise level (the average noise level over a 24-hour period) is expected to decrease at locations within the Leather District. The expansion would add tracks to the east of South Station further from the Leather District and would distribute the trains over a larger area and the project would also reduce the amount of train idling in the terminal area. This would also result in a reduction of the peak hour Leq noise level (the average sound pressure level during a period of time) along Atlantic Avenue and within the Leather District.

Prior to mitigation, the demolition and construction activity associated with the project would impact the South Station headhouse. While construction noise levels from the project are not expected to exceed FTA construction noise limits, they are expected to exceed the more stringent City of Boston construction noise limits at the existing headhouse based on the assumed construction equipment mix. Temporary noise barriers or noise enclosures for equipment would be utilized to mitigate construction noise levels at these receptors. A Construction Management Plan/Noise Control Plan would be implemented to mitigate construction noise levels, including providing noise monitoring during construction to determine compliance with FTA and City of Boston construction noise limits. With implementation of this proposed mitigation, FRA does not anticipate any construction noise impacts, and thus there will be no use under Section 4(f).

### **Vibration**

Due to the slow speed of trains entering and leaving South Station (approximately 10 mph), train vibration levels would be below FTA criteria<sup>6</sup>. Train activity at South Station is not expected to result in any ground-borne noise inside the headhouse. Vibration levels generated by the construction equipment proposed for this project would not result in structural damage to the headhouse or other nearby historic buildings, but could exceed the FTA human annoyance criterion<sup>7</sup> and will be addressed and mitigated under the Construction Management Plan/Noise Control Plan.

### **5.3. Determination of Section 4(f) Use**

Table 3 summarizes the Section 4(f) use determinations. Multiple historic properties are located within the SSX APE, as summarized in Table 2 (page 4). The project would have “no effect” on a majority of the historic properties, as discussed in the preceding section. With the exception of the *de minimis* impact of the seawall, project impacts to historic properties in the SSX APE would be limited to potential construction noise impacts to the South Station headhouse and potential operational noise impacts to the Fort Point Channel Historic District. As described in Sections 5.2 and 6.1, there would be

---

<sup>6</sup> Vibration levels from train movements would be below FTA human annoyance criteria (for both residential and non-residential receptors) and impact criterion for building damage, as presented in Federal Transit Administration’s (FTA’s) *Transit Noise and Vibration Impact Assessment*. (Report No. FTA-VA-90-1003-06). May 2006.

<sup>7</sup> *Ibid.*

no use under Section 4(f) of these properties, and a Construction Management Plan/Noise Control Plan would be implemented to assure construction noise would be in compliance with FTA and City of Boston construction noise limits. To minimize or eliminate adverse noise impacts to the Fort Point Channel Historic District, a noise barrier would be installed along the easternmost track, as described in Section 6.2. These mitigation measures would effectively minimize or eliminate any potential adverse project impacts. The project, as designed, would not have any adverse visual impacts on the South Station headhouse or surrounding historic properties.

FRA has determined that the project, implemented with noise mitigation and designed consistent with the historic preservation design principles (discussed in EA Section 3.17), would have no adverse effect on historic properties, and therefore would result in no Section 4(f) use, except in the case of the seawall, which would have a *de minimis* impact.

**Table 3 — South Station Determination of Section 4(f) Use**

<b>Name</b>	<b>Determination of Effect</b>
<b>Properties listed in the National and/or State Registers of Historic Places</b>	
Leather District	No Section 4(f) Use
Russia Wharf Buildings	No Section 4(f) Use
Commercial Palace Historic District	No Section 4(f) Use
Fort Point Channel Historic District	No Section 4(f) Use ( <i>De Minimis</i> impact determination for seawall)
South Station Headhouse	No Section 4(f) Use
Fort Point Channel Landmark District	No Section 4(f) Use
<b>Properties determined eligible for listing in National Register of Historic Places</b>	
Chester Guild, Hide and Leather Machine Company	No Section 4(f) Use
Chinatown District	No Section 4(f) Use
Federal Reserve Bank of Boston	No Section 4(f) Use
Kneeland Street Steam Heating Plant	No Section 4(f) Use
South End Industrial Area	No Section 4(f) Use
Weld Building	No Section 4(f) Use
Gillette	No Section 4(f) Use

## 6. Summary and Conclusions

As discussed above, there would be no substantive increases in visual impacts or vibration levels at these Section 4(f) parks or recreation areas, and therefore no constructive use of these facilities.

### 6.1. South Station Headhouse and Fort Point Channel Harborwalk

The project would provide substantial public recreational benefit to this portion of the Fort Point Channel waterfront with the proposal to reopen public access on Dorchester Avenue (which is currently closed off for private use for USPS postal operations). Restoration of Dorchester Avenue would include the addition of landscaping and improved pedestrian and cycling connections and facilities, including adjacent sidewalks and crosswalks. The proposed Dorchester Avenue Harborwalk, to be constructed along the newly reconstructed South Station, would complete a missing link in the 40-mile public walkway extending along the Boston Harbor waterfront. Constructing one-half mile of Harborwalk adjacent to Fort Point Channel would close one of the last remaining gaps in an otherwise continuous waterfront walkway. In addition to a dedicated pedestrian path, street furniture and landscaping would also be provided.

The SSX project will not result in direct alteration of the designated historic portions of the historic South Station headhouse, and the Project Team does not anticipate temporary occupancy of these areas during construction. The construction noise from the assumed mix of construction equipment has the potential to exceed the City of Boston construction noise limits, which are more stringent than FTA construction noise limits, at the historic headhouse, and vibration from construction equipment could exceed the FTA human annoyance criterion at the headhouse. The temporary construction impacts would be addressed through a Construction Management Plan/ Noise Control Plan, so that there would be no Section 4(f) constructive use during construction.

The Construction Management Plan/Noise Control Plan to be implemented to mitigate construction noise levels would include noise monitoring during construction to determine compliance with FTA and City of Boston construction noise limits. The Construction Management Plan/Noise Control Plan would provide a detailed list of construction equipment used in each construction phase, including the type and location of each piece of equipment. The Construction Management Plan/Noise Control Plan would establish vibration limits and other similar performance criteria, as well as require the contractor to plan and implement mitigating measures if adverse impacts were detected during construction.

If the construction noise levels were predicted to exceed the FTA or City of Boston construction noise limits, then appropriate noise mitigation measures, such as noise barriers, would be evaluated, including determining the appropriate location, height, and length of the noise barrier to provide effective mitigation. During construction at the South Station site, precondition surveys and vibration monitoring would be conducted to document initial conditions and to monitor vibration levels during construction. Below-grade work would be conducted under the technical monitoring of a geotechnical engineer, to observe and document construction procedures, monitor vibrations, and to anticipate and facilitate any needed mitigation measures.

In addition to this construction mitigation, permanent noise mitigation is proposed to substantially reduce operating noise from trains to avoid impacts on the Fort Point Channel Section 4(f) resources. As described in EA Section 3.3, the removal of the USPS facility would increase noise from idling locomotives across Fort Point Channel, which would otherwise result in noise impacts to the Harborwalk and the historic Fort Point Channel Historic District. The proposed installation of a 1,450-foot long, 18-foot-high noise barrier along the easternmost track of the South Station Terminal would eliminate or minimize these noise impacts, and there would be no constructive use of Section 4(f) resources.

## **6.2. Seawall Reconstruction**

A 700-foot section of the west historic Fort Point Channel seawall along Dorchester Avenue will be raised by 1.5 feet to match the elevation of the seawall to the north and south, which FRA and MassDOT have determined would have a *de minimis* impact. This *de minimis* determination is based on FRA's finding that there would be no adverse effect on the seawall, which is a contributing component of the Fort Point Channel historic district, and the fact that the elevation of the seawall represents mitigation to address sea level rise.

The option of not reconstructing the seawall is not considered a prudent and feasible alternative as it does not adequately mitigate and address sea level rise. The seawall is not at a consistent elevation throughout the site, it is being reconstructed to match higher sections to the north and south. The locations where the 100-year coastal flood zone encroaches upon the site correspond to the lower areas of seawall. If the seawall is not constructed, much of the South Station site, as well as much of the areas surrounding South Station, would be inundated in the future with the projected sea level rise during a 100-year flood event.

In the absence of mitigation, the 100-year floodplain would encompass approximately 38 acres of the SSX project footprint, representing nearly complete inundation of the site and infrastructure, during a 100-year flood event, assuming a 2-foot rise in sea level by the year 2050. By 2070, portions of the South Station platform areas could flood to a depth of between 0.5 feet and 1.5 feet under the conditions of a 3.2-foot rise in sea level. The proposed seawall would elevate the barrier to the Fort Point Channel to prevent inundation by channel waters due to sea level rise. In addition, the proposed wall addition would also elevate the seawall above the 100-year flood elevation, thereby substantially reducing the extent of flooding on the site.

Mitigation measures for impacts on historic resources are described in more detail in EA Section 3.17. The seawall improvements, which are within the Fort Point Channel Historic District, have been designed to be consistent with the Secretary of the Interior's Standards for Rehabilitation. Replacing the deteriorated railing would enhance preservation of this historic resource. The new course of seawall would be constructed of granite blocks, either recovered from near the seawall/channel or acquired from local quarries in Massachusetts or New England.

With the proposed mitigation measures, the Build Alternative would involve either no Section 4(f) use, or, in the case of the seawall, a *de minimis* impact.

This Page Intentionally Left Blank

**Attachment 2**  
**U.S. Department of the Interior Concurrence Letter**

This Page Intentionally Left Blank



# United States Department of the Interior

OFFICE OF THE SECRETARY  
Office of Environmental Policy and Compliance  
15 State Street – 8<sup>th</sup> Floor  
Boston, Massachusetts 02109-3572

June 20, 2017

9043.1  
ER 17/0235

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

**Subject: Draft Environmental Assessment and Draft Section 4(f) Evaluation  
South Station Expansion (SXX) Project  
Boston, Suffolk County, Massachusetts**

Dear Mr. Woelfel:

The U.S. Department of the Interior (Department) has reviewed the Draft EA and Section 4(f) Evaluation for the South Station Expansion Project. The project would expand the South Station train terminal and construct rail layover facilities at Widett Circle and the Readville Train Yard. The project would result in *de minimis* impacts to the Fort Point Channel Seawall, which is a contributing element of the Fort Point Channel Historic District. The Department has no comment on the Draft EA or the Section 4(f) Evaluation.

Thank you for the opportunity to review and comment on this project. Please contact me at (617) 223-8565 if I can be assistance.

Sincerely,

Andrew L. Raddant  
Regional Environmental Officer

cc: SHPO-MA (Brona.Simon@state.ma.us)  
FRA (amishi.castelli@dot.gov)

This Page Intentionally Left Blank

**Attachment 3**  
**Response to Comments on the Draft EA**  
**and Draft Section 4(f) Determination**

This Page Intentionally Left Blank



**South Station Expansion (SSX) Project**  
**Responses to Comments on the April 2017 Draft Environmental Assessment**  
**and Draft Section 4(f) Determination**  
September 29, 2017

This memorandum summarizes and responds to comments received on the South Station Expansion (SSX) project Draft Environmental Assessment and Draft Section 4(f) Determination (the EA), released by the Federal Railroad Administration (FRA) and the Massachusetts Department of Transportation (MassDOT) on April 26, 2017. Thirty (30) comment letters were received during the 30-day public comment period (April 26, 2017 to May 27, 2017).

All comments are addressed generally in this memorandum, but none required revisions to the EA. No letters were received from current elected officials; some letters were received from former elected officials. Certain comments requested an additional level of analysis or design that is not warranted or appropriate for this assessment of environmental impacts. Some public comments were about matters outside the scope of the National Environmental Policy Act (NEPA) analysis for the SSX project.

The following is a general overview of the comments received and general responses, presented by common theme. Individual comments and responses are presented alphabetically by topic in Table 1.

## **OVERVIEW OF COMMENTS AND GENERAL RESPONSES**

### **General Support**

The SSX project enjoys public support, with seven commenters expressing interest and anticipation for the transit, mobility, environmental, and economic development benefits of the project. Letters received from resource and regulatory agencies were in favor of or neutral about the project.

Numerous business and institutional membership organizations advocate for the advancement of this program. Commenters note the project would provide the following transportation and environmental benefits, including:

- Improved capacity of rail operations to enable growth in passenger rail transportation in Massachusetts and the Northeast Corridor.
- Improved service reliability and layover capacity.
- Improved bicycle, pedestrian, and passenger circulation.
- Relieved congestion at the curbside to enhance the efficiency of operations and passenger experience.
- Reopened Dorchester Avenue for public access to the South Boston Waterfront.
- Enhanced transportation services to support continued economic growth and development in the adjacent Financial District and South Boston Waterfront.

### **Relationship to Other Initiatives**

Some commenters asked that the SSX project not preclude the future construction of the North South Rail Link (NSRL) project. Some commenters asked that the NSRL project be included as an alternative to the SSX project.

When MassDOT first began its evaluation of the SSX project, the NSRL project was not under active consideration within the long-range planning activities for the Boston region. As a result, MassDOT did not include evaluation of the NSRL as part of the scope for this project evaluating options to expand South Station Rail Terminal capacity to meet current and future high-speed, intercity, and commuter rail service needs. However, FRA and MassDOT have designed the SSX project so as not to preclude the goals of the NSRL project, including the opportunity for future underground infrastructure, such as tunnel portals and



**South Station Expansion (SSX) Project**  
**Responses to Comments on the April 2017 Draft Environmental Assessment**  
**and Draft Section 4(f) Determination**  
September 29, 2017

station locations. MassDOT is conducting a study, separate from the SSX project, to re-evaluate the NSRL cost estimates and benefits to riders. This study is anticipated to be completed by Spring 2018.

Commenters also noted the importance of collaborating with the South Station Air Rights (SSAR) project, a proposed mixed-use development project, led by a private developer. As the SSX project advances to final design and construction, MassDOT, in coordination with the private developer of the SSAR project, will ensure the SSX project proceeds in a coordinated and efficient manner and will work with the relevant stakeholders to minimize conflicts in the implementation of the projects.

One commenter made suggestions to the I-90 Allston project. Beacon Park Yard (BPY) in Allston, previously identified as a third layover facility alternative in the SSX EA and Draft Environmental Impact Report (DEIR), is now subject to environmental review as part of the I-90 Allston project (Executive Office of Energy and Environmental Affairs (EEA No. 15278). Although the NEPA class of action has not been formally identified, MassDOT anticipates that the I-90 Allston project, including BPY, will be reviewed as an EA and led by the Federal Highway Administration.

### **Environmental and Socioeconomic Consequences**

Adjacent property owners and businesses at South Station, the Widett Circle, and Readville – Yard 2 layover facility sites, and the potential location site for the relocation of the U.S. Postal Service (USPS) General Mail Facility (GMF) submitted comments. Fidelity Investments, an adjacent business to South Station and the USPS GMF, expressed concerns about potential impacts to its property during project construction and operation. A few of these commenters expressed concerns about potential job losses from proposed business displacements at the Widett Circle and Readville – Yard 2 layover facility sites. Businesses from the Widett Circle and Readville – Yard 2 layover facility sites requested socioeconomic impacts be further explored, such as additional detail on business displacements, and the identification of potential relocation sites. A few commenters expressed interest in preserving Widett Circle for future joint development opportunities, as previously envisioned by the City of Boston. One commenter expressed concern for potential traffic impacts as a result of the potential USPS relocation site. Several commenters requested more explicit descriptions of the mitigation measures proposed in the EA, in particular for noise, vibration, and air quality impacts.

MassDOT conducted a full analysis of the socioeconomic conditions and impacts in the project area, and examined mitigation measures. The socioeconomic analysis can be found in Section 3.13 of the EA and also in the Draft Environmental Impact Report (DEIR) Appendix 4 – Socioeconomic Conditions Technical Report. The socioeconomic analysis for the project, including potential impacts and mitigation measures, was conducted in accordance with NEPA (42 U.S.C. 4321 et seq.), the Council of Environmental Quality regulations implementing NEPA (40 CFR Parts 1500–1508), and FRA’s *Procedures for Considering Environmental Impacts* (64 FR 28545 and 78 FR 2713) using the best available information, as discussed in EA Section 3.13 and in the DEIR Appendix 4 – Socioeconomic Conditions Technical Report (available on the project website). MassDOT and FRA conclude that no further review of socioeconomic effects is required in the EA.

For the purposes of this assessment, FRA and MassDOT assumed that the USPS GMF could be relocated to a site in South Boston on the Reserved Channel in Boston’s Seaport District (Figure 1 of EA Appendix B) that the USPS had previously identified as potentially appropriate to accommodate a relocated USPS GMF. The USPS would determine the future location(s) to which its operations would be relocated, and the relocation would be subject to its own environmental review as required by state and federal regulations as



**South Station Expansion (SSX) Project**  
**Responses to Comments on the April 2017 Draft Environmental Assessment**  
**and Draft Section 4(f) Determination**  
September 29, 2017

a separate project. The actual relocation of the USPS GMF would be subject to negotiations between the USPS and MassDOT/Commonwealth of Massachusetts.

MassDOT/MBTA will complete all property acquisitions and business relocations required for the project, including those required for the USPS and layover facility sites, in accordance with the Uniform Relocation Assistance and Real Property Acquisitions Policies Act of 1970 (commonly known as the Uniform Act) as amended, and implementing regulations (at 49 CFR Part 24) from the U.S. Department of Housing and Urban Development (HUD) and the U.S. Department of Transportation (DOT).

MassDOT understands that the City of Boston is considering the Widett Circle site as a potential location for future long-term development (via building a platform or deck over the future layover yard that is proposed by the SSX project). The design of the Widett Circle layover facility can accommodate and does not preclude future air rights development opportunities, which are outside the scope of this project. MassDOT and the City of Boston have created a Joint Development Working Group to conduct focused analysis on future opportunities in this area.

FRA and MassDOT developed the mitigation measures as described in the EA and FONSI based on the current level of design of the project. These mitigation measures will be revised and refined, as necessary, as the project progresses through to final design. MassDOT/MBTA and FRA have committed to implementing the environmental commitments and mitigation measures listed in the EA and memorialized in the FONSI. MassDOT/MBTA will continue to coordinate with Fidelity Investments during the next stages of design. FRA and MassDOT conclude that further analysis of mitigation measures is not appropriate at this stage of the project.

### **Design and Construction**

A few agencies, the Massachusetts Port Authority [Massport], Massachusetts Water Resources Authority [MWRA], Boston Water and Sewer Commission [BWSC], and the City of Boston, requested continued coordination with FRA and MassDOT/MBTA as SSX project design advances and during the construction phase. MassDOT/MBTA will continue to work with all appropriate agencies to identify necessary permits.

Some commenters suggested that the 2014 DEIR conceptual design cost estimate be included in the EA. Some commenters provided suggestions for design improvements for the SSX project, covering a broad range of project elements, including pedestrian circulation (including ADA-related design and construction issues), rerouting MBTA bus service to Dorchester Avenue, and future air rights development opportunities.

The cost estimate included in the October 2014 DEIR was based upon conceptual designs developed for each major element of the project to support environmental documentation. The \$1.43 billion cost estimate for the Transportation Improvements Only Alternative (TIO) in the DEIR is in year 2014 dollars. As project sponsor, MassDOT will continue to refine the cost estimate as the design progresses.

Design suggestions received during this environmental review will be further considered during the next phase of project development. The FONSI states the commitments to coordinate with all relevant parties and agencies as design advances.



**South Station Expansion (SSX) Project  
Responses to Comments on the April 2017 Draft Environmental Assessment  
and Draft Section 4(f) Determination**  
September 29, 2017

**COMMENTS RECEIVED** *(presented in alphabetical order, by category):*

*General Public*

- Jameson Brown
- Frank S. DeMasi
- Lawrence DiCara
- Brian Gregory
- Jon Jutstrom
- Steven H. Olanoff
- Dr. Robin Pope
- David Sindel
- John Stella
- Karen Taylor
- Deborah Wrighton-Wex

*Elected Officials, Resource and Regulatory Agencies*

- Mashpee Wampanoag Tribe
- U.S. Department of the Interior<sup>1</sup>
- City of Boston, Office of the Mayor
- Former Governor of Massachusetts Michael S. Dukakis
- Massachusetts Historical Commission
- Massachusetts Port Authority
- Massachusetts Water Resources Authority

*Other Interested Stakeholders*

- A Better City
- Americold Logistics, LLC
- Brad Bellows Architects (2)
- Drew Company
- Fidelity Investments
- Lawson & Weitzen, LLP (on behalf of James G. Grant Co., LLC)
- Massachusetts Convention Center Authority
- New Boston Food Market Development Corporation
- North South Rail Link Working Group
- Pappas Enterprises, Inc.
- Sierra Club Massachusetts Chapter
- The Citizens Advisory Committee for the North South Rail Link Project

---

<sup>1</sup> In accordance with 23 CFR 774.5(a), the FRA provided the U.S. Department of the Interior a minimum of 45-days to review and comment on FRA's proposed Section 4(f) Determination.



**South Station Expansion (SSX) Project**  
**Responses to Comments on the April 2017 Draft Environmental Assessment**  
**and Draft Section 4(f) Determination**  
 September 29, 2017

**Table 1**      **Summaries of Individual Comments and Responses** (presented alphabetically by topic)

<b>Topic</b>	<b>Category</b>	<b>Summary of Comment</b>	<b>Response</b>
<b>Design and Construction</b>	<b>Other Interested Stakeholders</b>	<b>Commenter (Brad Bellows Architects):</b> "...According to the attached DEIR appendix, the 2014 estimate for TIO [Transportation Improvements Only Alternative] costs only, including acquisition of the USPS property, was \$1.43 billion. If I understand correctly, the current estimate is \$1.60 billion for construction + \$384 million for the USPS property = \$1.984 billion. ...An increase of over \$500 million in less than 3 years (a 39% increase) is obviously very pertinent to our current public debate and I think should be released as part of the current review process. ..."	The cost estimate included in the October 2014 DEIR was based upon conceptual designs developed for each major element of the project to support environmental documentation. The \$1.43 billion cost estimate for the Transportation Improvements Only Alternative (TIO) in the DEIR is in year 2014 dollars. As project sponsor, MassDOT will continue to refine the cost estimate as the design progresses.
<b>Design and Construction</b>	<b>Other Interested Stakeholders</b>	<b>Commenter (Fidelity):</b> "...The expansion and opening of Dorchester Ave will significantly impact the operation of Fidelity's loading dock at 245 Summer Street. Implicit in the new design is removal of a staging area currently provided. No alternative has been suggested that we are aware of. Additionally, we have been informed that "all truck maneuvering would occur off street." We ask the project to provide clarification and inform us how our existing delivery requirements will be met without impacting the surrounding environment. ..."	MassDOT/MBTA will continue to coordinate with Fidelity Investments throughout the next stages of design, reviewing operations of the loading dock at 245 Summer Street.
<b>Design and Construction</b>	<b>Other Interested Stakeholders</b>	<b>Commenter (Fidelity):</b> "...We have many concerns associated with the widening of Dorchester Avenue and removal of Fidelity's patio. First and foremost, we ask the project to carefully analyze the impacts to Fidelity's sensitive equipment, utility vaults and building infrastructure, all of which are located beneath the patio or immediately within the building footprint adjacent to the patio. Water, electric, telephone, data and fiber located under Dorchester Avenue provide building utilities and all need to be carefully maintained during construction to prevent disruption and ensure business continuity, including quality of water etc. Further, structural elements of the patio play a critical role in the safety/building hardening of 245 Summer Street. Any alterations affecting the patio area must be designed to maintain building hardening to mitigate vehicular and other threats, both on the Dorchester side of the building as well as on Parcel H, following removal of the security gates. ..."	MassDOT/MBTA will continue to coordinate with Fidelity Investments throughout the next stages of design, including the reopening of Dorchester Avenue and any necessary removal of Fidelity's patio and adjacent subsurface elements.



**South Station Expansion (SSX) Project  
Responses to Comments on the April 2017 Draft Environmental Assessment  
and Draft Section 4(f) Determination  
September 29, 2017**

<b>Topic</b>	<b>Category</b>	<b>Summary of Comment</b>	<b>Response</b>
<b>Design and Construction</b>	<b>Other Interested Stakeholders</b>	<b>Commenter (Fidelity):</b> "...Throughout construction, all points of egress for 245 Summer Street must be maintained for life safety. This includes the Summer Street/Dorchester Avenue corner as well as two points of egress located on Parcel H...."	FRA and MassDOT acknowledge the need to maintain these points of egress during construction. MassDOT/MBTA will continue to coordinate on this subject matter with Fidelity Investments throughout the next stages of design.
<b>Design and Construction</b>	<b>Other Interested Stakeholders</b>	<b>Commenter (Fidelity):</b> "...We ask that the project investigate geotechnical impacts of construction, including any impact on the foundation of our building. We also ask that the project continue to investigate vibration and noise for all alternatives, as the project evolves over time, and detail the impacts to 245 Summer Street to maintain the integrity of that structure and for business continuity, as that site will remain occupied as Fidelity Investments' corporate headquarters throughout construction. We have previously opened up the side of 245 Summer Street to allow natural light into the building. We ask that the project investigate the impacts that a proposed temporary noise barrier would have on the occupants and exterior landscape of 245 Summer Street. We are concerned not only with the control of construction noise, but also the impact on the flow of natural light into the building. Further, we are concerned with the appearance of the barrier itself and how it's built (materials used, quality of construction, etc.) ...."	EA Section 3.3 and FEIR Section 3.12 describe potential project impacts. FRA and MassDOT obtained vibration measurements in August 2013 both inside the basement area of 245 Summer Street near the sensitive computer systems and outside adjacent to the building during train activity at South Station. A copy of this vibration assessment report is available to Fidelity Investments.  The proposed 18-foot high noise barrier, referenced in EA Section 3.3, would be significantly lower than the existing 30-40-foot-tall USPS building. In addition, the noise barrier would be set back from Dorchester Avenue and located close to the easternmost track. As a result, the proposed noise barrier would have much less impact on the occupants and the exterior landscape of 245 Summer Street than the existing USPS facility.  MassDOT/MBTA will continue to coordinate with Fidelity Investments throughout the next stages of design, including on the design of the noise barrier.
<b>Design and Construction</b>	<b>Public</b>	<b>Commenter (David Sindel):</b> "...Currently, the route 11 bus follows a wide one-way loop which often gets stuck in Seaport traffic. With Dorchester Avenue no longer closed to traffic, consideration should be given to routing the bus on Dorchester Avenue in one or both directions, should shorter travel times (and thus higher frequency possible with the same number of vehicles) outweigh any lost connections on the current route. If such a rerouting is pursued, the street design should include bus stop islands with bicycle lanes routed behind them."	Bus routing is controlled by the MBTA, and is not a component of this project. However, FRA and MassDOT have coordinated with the MBTA to accommodate buses on Dorchester Avenue should the MBTA decide to reroute existing service to Dorchester Avenue. Design documents for the project include accommodation of a bus stop on Dorchester Avenue along the curb closest to the new station headhouse along with a turnaround for buses in the vicinity of the I-90 Vent Building.
<b>Design and Construction</b>	<b>Public</b>	<b>Commenter (David Sindel):</b> "...The expanded station and reconfigured interlockings should be designed to support high-frequency (10-15 minute all-day headways) local service on the Fairmount Line and the inner Worcester Line - two commuter rail lines which run through densely populated areas underserved by	The preferred South Station design will mitigate areas of pedestrian congestion and poor level of service within the concourse by providing improved pedestrian circulation accommodations, such as including a new elevated concourse to better facilitate mid-platform boarding and



**South Station Expansion (SSX) Project**  
**Responses to Comments on the April 2017 Draft Environmental Assessment**  
**and Draft Section 4(f) Determination**  
 September 29, 2017

Topic	Category	Summary of Comment	Response
		current rapid transit. Consideration should be given to having a dedicated platform for each of these potential local services with convenient paths to the Red and Silver lines, as well as interlockings designed to keep these local services from interfering with commuter rail and intercity traffic....”	alighting and connections to the Silver Line and Red Line platforms. Proposed SSX project improvements to the terminal tracks and the approach interlockings are designed to maximize efficiency of the system and could accommodate future service expansions or increased frequencies. The next phase of the SSX project will further design of the Tower 1 Interlocking to identify opportunities for future service improvements. MassDOT will analyze potential future service alternatives as part of a new MassDOT initiative, expected to commence later this year.
<b>Design and Construction</b>	<b>Resource and Regulatory Agencies, and Elected Officials</b>	<b>Commenter (Massachusetts Port Authority [Massport]):</b> Massport encourages continued coordination with MassDOT during design and construction to minimize construction impacts to airspace. MassDOT will be required to file multiple FAA Form 7460s (one for building, separate filings for construction cranes).	As noted in EA Section 5.5, MassDOT/MBTA has coordinated with Massport throughout the project planning phase, and will continue to coordinate with Massport throughout design and construction of the project to minimize construction impacts to airspace, and to identify necessary permits.
<b>Design and Construction</b>	<b>Resource and Regulatory Agencies, and Elected Officials</b>	<b>Commenter (Massachusetts Water Resources Authority [MWRA]):</b> “...In its FEIR, MassDOT also stated that it will confirm existing outfall discharges through data collection and or field inspection and, "once the existing wastewater system is fully modeled," will develop a plan to mitigate the impacts from the proposed facility expansion. MWRA requested receiving from MassDOT a copy of the data it collects on the existing sewer system performance and any sewer system model results of existing and proposed (Build) conditions. ...”	MassDOT/MBTA will gather/develop data on the existing sewer system performance and sewer model results from existing and proposed (Build) conditions during subsequent design phases for the project. MassDOT/MBTA will continue to coordinate with MWRA and will provide the data after it has been collected.
<b>Design and Construction</b>	<b>Resource and Regulatory Agencies, and Elected Officials</b>	<b>Commenter (MWRA):</b> “...In the event tunnels will be constructed as part of the SSX Project, pursuant to 360 C.M.R. 10.023(1), the discharge of seepage or continuous groundwater discharge into the MWRA sanitary sewer system is prohibited. The MWRA cannot allow the discharge of post construction groundwater seepage into the sanitary sewer system. ...”	No tunnels are proposed as part of the SSX project. MassDOT/MBTA will continue to coordinate with the MWRA and BWSC as the project design progresses.
<b>Design and Construction</b>	<b>Resource and Regulatory Agencies, and Elected Officials</b>	<b>Commenter (MWRA):</b> “... In the FEIR submitted to the MEPA office, MassDOT stated that BWSC [Boston Water and Sewer Commission] had indicated there likely is not adequate existing piping in the immediate vicinity of the project site in which the I/I [Infiltration and Inflow] work could be performed to meet the necessary level of offset. Sewer systems in other areas that are hydraulically connected to the mains in the vicinity of the South	MassDOT/MBTA will continue to coordinate with MWRA during subsequent design phases on the I/I plan, particularly regarding the CSO outfalls in the vicinity of the SSX project. In addition, there are other projects planned in the area that may impact the I/I plan and MassDOT/MBTA will continue coordination with those projects to ensure all future flows are mitigated accordingly.



**South Station Expansion (SSX) Project**  
**Responses to Comments on the April 2017 Draft Environmental Assessment**  
**and Draft Section 4(f) Determination**  
 September 29, 2017

Topic	Category	Summary of Comment	Response
		<p>Station site potentially could be used to meet I/I sewer system rehabilitation requirements. The FEIR also pointed out that I/I reduction opportunities may exist in other areas of Boston, but MWRA is concerned that I/I reduction opportunities remote from the SSX project may not contribute to achieving the necessary level of wastewater offset. MWRA is pleased that MassDOT recognizes the importance of I/I removal to avoid worsening CSO [Combined Sewer Overflow] discharges and potentially compromising compliance with federal court ordered levels of CSO control. MWRA asks that MassDOT demonstrate with its I/I plan an assurance that CSO impacts from the new wastewater flows are fully mitigated at the several Fort Point Channel and Boston Inner Harbor CSO outfalls hydraulically associated with the BWSC sewer system serving South Station. ...”</p>	
<b>Design and Construction</b>	<b>Resource and Regulatory Agencies, and Elected Officials</b>	<p><b>Commenter (MWRA):</b> “... MassDOT must also comply with 360 C.M.R. 10.016, if it intends to install gas/oil separator(s) in any of its bus and/or rail facilities to support shops, vehicle storage buildings, and/or in the vehicle wash building planned for the site. In addition to complying with 360 C.M.R. 10.000, MassDOT will need to conform to the regulations of the Board of State Examiners of Plumbers and Gas Fitters, 248 C.M.R. 2.00 (State Plumbing Code), and all other applicable laws. The installation of proposed gas/oil separator(s) will require MWRA approval and may not be back filled until inspected and approved by the MWRA and the Local Plumbing Inspector. For assistance in obtaining an inspection for each facility MassDOT should contact Mr. Stephen Howard, Source Coordinator, within the TRAC Department at (617) 305-5675. ...”</p>	<p>Thank you for providing this contact information. No vehicle wash operations are proposed as part of the SSX project. MassDOT/MBTA will comply with 360 C.M.R. 10.016 (as it relates to installation of gas/oil separators), as well as 248 C.M.R. 2.00 (State Plumbing Code), and all other applicable laws. MassDOT/MBTA will contact the Toxic Reduction and Control (TRAC) Department to obtain an inspection for each facility prior to obtaining approval from MWRA and the Local Plumbing Inspector.</p>
<b>Design and Construction</b>	<b>Resource and Regulatory Agencies, and Elected Officials</b>	<p><b>Commenter (MWRA):</b> “... MWRA expects to continue to work closely with the Proponents and their Consultants to identify where 8(m) permits will be required. ...”</p>	<p>MassDOT/MBTA will continue to work with all appropriate agencies to identify necessary permits.</p>
<b>Design and Construction</b>	<b>Resource and Regulatory Agencies, and Elected Officials</b>	<p><b>Commenter (MWRA):</b> “... Once the SSX Project is completed, and if the Proponent(s) intends to discharge wastewater from a vehicle wash and/or maintenance operation to the MWRA sanitary sewer system, a Sewer Use Discharge Permit will be required. For assistance in obtaining this permit, the Proponent should contact</p>	<p>No vehicle wash operations are proposed as part of the SSX project.</p>



**South Station Expansion (SSX) Project  
Responses to Comments on the April 2017 Draft Environmental Assessment  
and Draft Section 4(f) Determination**  
September 29, 2017

Topic	Category	Summary of Comment	Response
		George Riley, Industrial Coordinator in the TRAC Group at (617) 305-5664. The SSX Project is required to have this permit prior to discharging any wastewater from a vehicle wash process into the sewer system. ...”	
<b>Design and Construction</b>	<b>Resource and Regulatory Agencies, and Elected Officials</b>	<p><b>Commenter (City of Boston):</b> Summary of main points (<i>see letter for more detail</i>):</p> <ol style="list-style-type: none"> <li>1) SSX should not preclude significant new growth for mixed-use and residential development at Newmarket/Widett Circle.</li> <li>2) SSX should allow for joint air rights and terra firma development in the Financial District and South Station area.</li> <li>3) SSX should facilitate more reliable and frequent regional transit – do not preclude future conversion to an electrified service operating trains at subway-level frequency.</li> <li>4) SSX should facilitate the reopening of Dorchester Avenue along Fort Point Channel, enhancing local circulation and better walking and biking connections.</li> <li>5) SSX must be mindful of future sea level rise and storm surge, and not precluding resiliency investments along the channel, as well as at Widett Circle.</li> <li>6) The City requests continued progress and coordination between federal departments and agencies in advancing USPS relocation and transportation improvements in Waterfront area.</li> </ol>	<p>MassDOT has established a Working Group with the City of Boston to continue coordination on SSX design elements, air rights development at South Station and Widett Circle, and the design of Dorchester Avenue.</p> <ol style="list-style-type: none"> <li>1) MassDOT understands that the City of Boston is considering Widett Circle as a potential location for future air rights development. This would require decking over any future layover yard to provide a ground plane to build on. The proposed design of the Widett Circle layover facility can accommodate and does not preclude future air rights development opportunities, which are outside the scope of this project. As any City efforts advance, MassDOT/MBTA will continue to coordinate with the City to help realize a future development vision for Widett Circle.</li> <li>2) MassDOT recognizes the potential for joint development at the South Station site and the proposed design of the headhouse expansion accommodates potential future joint development.</li> <li>3) One of the main goals of the SSX project is to improve service reliability and provide opportunities to expand intercity passenger rail and commuter rail services. Proposed SSX project improvements to the terminal would not preclude future service expansions, increased frequencies, or changes to vehicle technology.</li> <li>4) One of the main goals of the SSX program is to restore approximately 0.5 miles of Dorchester Avenue (which is currently closed off for USPS operations only) for public use and for station access, reconnecting the Financial District to the South Boston area. As currently designed, the project will include landscaping and improved pedestrian and cycling connections and facilities, including adjacent sidewalks and crosswalks, and construction of a 0.5-mile extension of the Harborwalk.</li> </ol>



**South Station Expansion (SSX) Project**  
**Responses to Comments on the April 2017 Draft Environmental Assessment**  
**and Draft Section 4(f) Determination**  
 September 29, 2017

Topic	Category	Summary of Comment	Response
			<p>5) FRA and MassDOT acknowledge this comment. As noted in the City’s comment letter, FRA and MassDOT have incorporated resiliency measures in the Build Alternative (such as raising the depressed section of Dorchester Avenue and the Fort Point Channel seawall to protect South Station from future flooding events and elevating mechanical, electrical, and plumbing infrastructure in the headhouse expansion). MassDOT will continue to identify additional opportunities for improved resiliency throughout the next phase of design.</p> <p>6) FRA and MassDOT acknowledge this comment and will continue coordination with all relevant parties and agencies in advancing the USPS relocation and other relevant transportation improvements in the Waterfront area. Although demolition of the USPS facility after it is vacated is part of the project, the relocation of USPS operations is not part of the project. The USPS would determine the future location(s) to which its operations would be relocated, and the relocation would be subject to its own environmental review as required by state and federal regulations as a separate project. Costs associated with relocation of the USPS operations has been and will continue to be considered as part of the negotiations between MassDOT and the USPS in future phases of the project.</p>
<b>Design and Construction</b>	<b>Resource and Regulatory Agencies, and Elected Officials</b>	<b>Commenter (Massport):</b> Major arterials in South Boston, Summer Street and Seaport Blvd are critical truck routes serving the Port, industrial and commercial businesses. Massport would like to remind all agencies that continued truck access and operational efficiencies in the South Boston Waterfront should be a priority.	FRA and MassDOT acknowledge this comment. The project would not impact the functionality of the South Boston arterials as truck routes.
<b>Design and Construction</b>	<b>Resource and Regulatory Agencies, and Elected Officials</b>	<b>Commenter (Massport):</b> The project design should ensure that connections to the Silver Line Transitway and Logan Airport are maintained and improved wherever possible.	FRA and MassDOT acknowledge this comment. The SSX project maintains the existing Silver Line connections at South Station.



**South Station Expansion (SSX) Project  
Responses to Comments on the April 2017 Draft Environmental Assessment  
and Draft Section 4(f) Determination  
September 29, 2017**

<b>Topic</b>	<b>Category</b>	<b>Summary of Comment</b>	<b>Response</b>
<b>Environmental Consequences</b>	<b>Resource and Regulatory Agencies, and Elected Officials</b>	<b>Commenter (Mashpee Wampanoag Tribe [MWT]):</b> “We have no concerns related to the proposed [South Station Expansion] project. MWT anticipates no adverse effects to our sites of cultural significance, by you or your client.”	Thank you for your comment.
<b>Environmental Consequences</b>	<b>Resource and Regulatory Agencies, and Elected Officials</b>	<b>Commenter (Massachusetts Historical Commission):</b> Concurs with FRA’s Conditional No Adverse Effect Finding for the project.	Thank you for your comment.
<b>Environmental Consequences</b>	<b>Resource and Regulatory Agencies, and Elected Officials</b>	<b>Commenter (United States Department of the Interior, Office of Environmental Policy and Compliance):</b> Concurs with FRA’s <i>de minimis</i> finding. “The project would result in <i>de minimis</i> impacts to the Fort Point Channel Seawall, which is a contributing element to the Fort Point Channel Historic District. The Department has no comment on the Draft EA or the Section 4(f) Evaluation.”	Thank you for your comment.
<b>Environmental/Socioeconomic Consequences (Readville - Yard 2)</b>	<b>Other Interested Stakeholders</b>	<b>Commenter (Lawson &amp; Weitzen, LLP representing James G. Grant Co., LLC):</b> “...The proposed project must be designed to conform to performance standards contained in the Massachusetts Wetlands Protection Act and its associated regulations, where applicable. These issues have not been addressed by the Draft EA.... The impact of the increased runoff on water quality should be further analyzed.... Moreover, the scope of drainage pipes at Readville – Yard 2 is unknown. Underdrains at the site discharge to the Neponset River, which is already impaired. The current conditions of those drainage pipes are unknown, and more evaluation is needed in order to determine necessary design issues. These drainage issues should be fully addressed.”	<p>The SSX project has been designed to conform to Massachusetts Wetlands Protection Act performance standards as noted in the EA Section 3.5, and included in the (MEPA) DEIR Appendix 5 – Natural Resources Tech Report, Section 4.5. Clarification of the jurisdiction of the potential isolated vegetated wetland on the Readville – Yard 2 layover facility site, and how MassDOT/MBTA would meet any applicable regulations and/or performance standards is further defined in the Final Environmental Impact Report (FEIR), Section 3.4.2.</p> <p>As stated in EA Section 3.4.3, to minimize project impacts, structural and nonstructural stormwater best management practices (BMPs) would be installed by MassDOT/MBTA, as necessary, to mitigate the changes in stormwater runoff volumes and peak rates, and to limit the impact from construction and operation on nearby waterbodies, including maintenance of the Total Maximum Daily Loads (TMDLs) of the Neponset River. The BMPs would be implemented by MassDOT/MBTA in compliance with City of Boston</p>



**South Station Expansion (SSX) Project**  
**Responses to Comments on the April 2017 Draft Environmental Assessment**  
**and Draft Section 4(f) Determination**  
 September 29, 2017

Topic	Category	Summary of Comment	Response
			<p>Complete Streets guidelines and MassDEP stormwater management criteria and federal guidelines.</p> <p>During the project’s final design phase, MassDOT/MBTA would inspect the storm drain system and assess its condition to determine the appropriate next steps.</p>
<b>Environmental/ Socioeconomic Consequences (Readville - Yard 2)</b>	<b>Other Interested Stakeholders</b>	<b>Commenter (Lawson &amp; Weitzen, LLP representing James G. Grant Co., LLC):</b> “...The cost of the necessary taking associated with Readville - Yard 2 has not been identified. The impacts of that taking should be further explored, both in terms of costs and impacts to long-term employment as well as related environmental consequences. ... Taking of .7 acres of Grant's property- nearly ten percent of its property - will force Grant to greatly downscale its operations or cease operations altogether. ... While the Draft EA suggests that relocation aid will be given to Grant, it is tremendously difficult to site a waste and transfer business; Grant cannot locate a suitable replacement site in the vicinity. ...If Grant curtails or ceases its operations, C&D waste generated by the city and region will have to be trucked and disposed of, at great expense, in landfills outside the region and state.”	<p>As described in EA Sections 3.12.3 and 3.13.3, MassDOT may provide moving-related expenses and, if required, relocation assistance for affected property owners at the Readville - Yard 2 layover facility site in accordance with the procedures outlined in the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970. The Act provides benefits and protections for persons or businesses whose real property is acquired or who would be displaced by federally funded projects, and require just compensation. Relocation assistance would be provided to affected owners. A business that is relocated as a result of the project may be entitled to such benefits as moving and reestablishment costs.</p>
<b>Environmental/ Socioeconomic Consequences (South Station)</b>	<b>Public</b>	<b>Commenter (John Stella):</b> “Please do not demolish the famous old train station “South Station” which is part of public transit access to trains and buses.”	<p>The SSX preferred alternative maintains the existing head house and expands passenger capacity on the current site of the USPS building.</p>
<b>Environmental/ Socioeconomic Consequences (South Station)</b>	<b>Public</b>	<b>Commenter (Timothy Pappas):</b> “...The Post Office will harm many small businesses in South Boston by adding a crippling level of truck traffic and resulting pollution level increases. ...I want to also let you know that there are many business owners who will fight rigorously to prevent the Post Office coming farther into South Boston, even if that means the South Station Expansion cannot move ahead. If there is a forum to discuss alternatives for the Post Office, we would be pleased to have a seat at the table for those discussions and would re-consider our position on the Expansion.”	<p>For the purposes of this assessment, it was assumed that the USPS GMF could be relocated to a site in South Boston on the Reserved Channel in Boston’s Seaport District (Figure 1 of EA Appendix B) that the USPS had previously identified as potentially being appropriate to accommodate a relocated USPS GMF. However, the USPS would determine the future location(s) to which its operations would be relocated, and the relocation would be subject to its own environmental review (including a traffic study) as required by state and federal regulations as a separate project. The actual relocation of the USPS GMF would be subject to negotiations between the USPS and MassDOT/the Commonwealth of Massachusetts.</p>



**South Station Expansion (SSX) Project  
 Responses to Comments on the April 2017 Draft Environmental Assessment  
 and Draft Section 4(f) Determination  
 September 29, 2017**

Topic	Category	Summary of Comment	Response
			<p>The representative environmental impact analysis FRA and MassDOT conducted as part of the NEPA process (documented in Appendix B of the EA) showed that potential USPS relocation site would result in more convenient access to the I-90 and I-93 interstate ramps off Congress Street and the South Boston Bypass Road via the Massport Haul Road for trucks. Overall, using the representative analysis, FRA and MassDOT found that the USPS relocation would reduce vehicle miles traveled on local roads due to the more convenient regional highway connections at the potential relocation site.</p>
<p><b>Environmental/ Socioeconomic Consequences (South Station)</b></p>	<p><b>Other Interested Stakeholders</b></p>	<p><b>Commenter (Fidelity):</b> "...Fidelity has concerns regarding impacts the proposed changes will have to ground or salt water. It is unclear in the documents whether a study has been completed regarding this topic. As mentioned above, Fidelity has critical infrastructure below grade at 245 Summer Street which is sensitive to moisture. Therefore, we ask the project to provide us detail on the risks associated with changes to the surrounding landscape. ..."</p>	<p>The EA examined impacts to groundwater based on a level of conceptual design. FRA and MassDOT has coordinated with Fidelity Investments throughout the project planning phase and, as design progresses, MassDOT/MBTA will continue to coordinate with Fidelity Investments throughout the next stages of design, including developing a more detailed geotechnical analysis of the South Station and USPS sites. MassDOT would complete geotechnical borings and/or test pits during the design development phase to determine the hydraulic permeability, groundwater elevations, and soil/groundwater contamination levels, and the potential to implement infiltration and non-infiltration BMPs.</p>
<p><b>Environmental/ Socioeconomic Consequences (South Station)</b></p>	<p><b>Other Interested Stakeholders</b></p>	<p><b>Commenter (Fidelity):</b> "...Precautions must be taken to mitigate floodwaters during the reconstruction of the seawall, especially since Fidelity maintains critical infrastructure below grade at 245 Summer Street. ..."</p>	<p>FRA and MassDOT have incorporated resiliency measures in the Build Alternative (such as raising the depressed section of Dorchester Avenue and the Fort Point Channel seawall to help protect South Station from future flooding events as well as elevating mechanical, electrical, and plumbing infrastructure in the headhouse expansion). MassDOT will continue to identify additional opportunities for improved resiliency and will coordinate with Fidelity Investments throughout the next stages of design, including developing a construction management plan (CMP) for the reconstruction of the portion of the seawall along Dorchester Avenue.</p>



**South Station Expansion (SSX) Project  
Responses to Comments on the April 2017 Draft Environmental Assessment  
and Draft Section 4(f) Determination  
September 29, 2017**

Topic	Category	Summary of Comment	Response
<b>Environmental/ Socioeconomic Consequences (Widett Circle)</b>	<b>Other Interested Stakeholders</b>	<p><b>Commenter (Americold):</b> "...We reviewed the EA and are concerned that it does not sufficiently analyze the potential impacts of the Project on the socioeconomic environment. Nor do we believe that the EA contains sufficient analysis of the proposed mitigation measures to support the conclusion that the proposed mitigation measures would reduce impacts to less-than-significant levels. ...Potential relocation sites must be identified so that the various factors that comprise economic viability can be analyzed on a site-by-site basis. ...In order to assess the impact of a proposed action on the socioeconomic environment of the affected area, the Federal Railroad Administration's (the "FRA") Procedures for Considering Environmental Impacts (64 Federal Register 28545 [May 26, 1999]) requires consideration of: (1) the numbers and kinds of available jobs; (2) the potential for community disruption and demographic shifts; (3) the need for and availability of relocation housing; (4) impacts on commerce, including existing business districts, metropolitan areas, and the immediate area of the alternative; and, (5) impacts on local government services and revenues. ..."</p>	<p>FRA and MassDOT completed the socioeconomic analysis for the project, including potential impacts and mitigation measures in accordance with FRA's Procedures for Considering Environmental Impacts (64 Federal Register 28545 [May 26, 1999]) using the best available information, as discussed in EA Section 3.13 and in the DEIR Appendix 4 – Socioeconomic Conditions Technical Report (available on the project website).</p> <p>MassDOT/MBTA will complete all property acquisitions and business relocations required for the project, including those required for the USPS and layover facility sites, in accordance with the Uniform Relocation Assistance and Real Property Acquisitions Policies Act of 1970 (commonly known as the Uniform Act) as amended, and implementing regulations (at 49 CFR Part 24) from the U.S. Department of Housing and Urban Development (HUD) and the U.S. Department of Transportation (DOT).</p> <p>MassDOT/MBTA will continue to work with the City of Boston and the businesses in the Widett Circle area through the next phases of project development.</p>
<b>Environmental/ Socioeconomic Consequences (Widett Circle)</b>	<b>Other Interested Stakeholders</b>	<p><b>Commenter (New Boston Food Market [NBFM] Development Corporation):</b> "...We are writing to oppose in the strongest possible terms the continued inclusion of Widett Circle as an alternative site on which to park trains, as is articulated in the Draft Environmental Assessment Alternatives Analysis MassDOT has submitted to the Federal Railroad Administration. As we commented last June in a similar letter to MassDOT, the taking of this property would have far reaching consequences on our 21 private businesses and 900 employees. As the only private property being considered for a layover site, taking our land will be a crushing burden on the budget of the taxpayer funded, public agency, MassDOT. Further, such a taking would have a significant negative effect on the City of Boston's non-professional employment, and ignores the City of Boston's extensive planning efforts for the Dorchester Avenue corridor, and the broader vision articulated in Boston's Draft Imagine 2030 plan released in</p>	<p>As described in EA Sections 3.12.3 and 3.13.3, MassDOT would provide acquisition and, if required, relocation assistance for affected property owners at the Widett Circle layover facility site in accordance with the procedures outlined in the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970. The Act provides benefits and protections for persons or businesses whose real property is acquired or who would be displaced by federally funded projects, and require just compensation. Relocation assistance would be provided to affected owners. It is anticipated that suitable relocation sites are available within the industrial sites in the immediate South Boston area for the displaced Widett Circle businesses.</p> <p>FRA and MassDOT understand that the City of Boston is considering Widett Circle as a potential location for future</p>



**South Station Expansion (SSX) Project**  
**Responses to Comments on the April 2017 Draft Environmental Assessment**  
**and Draft Section 4(f) Determination**  
 September 29, 2017

Topic	Category	Summary of Comment	Response
		<p>November 2016. ... We have been in discussions with brokers and developers on plans to purchase Widett Circle from our co-op in order to redevelop the entire site in to a mixed-use project. A major component of those conversations has been the successful relocation of all of our businesses to a site within City limits, with newly developed, state-of-the-art facilities, and excellent access for all of our 21 businesses. But, these conversations have been thwarted as a result of MassDOT’s decision to continue to evaluate Widett Circle in their South Station Expansion project. ... Finally, Mayor Martin Walsh has made it clear to us, as business owners and employees, that New Boston Food Market is important to him and to Boston’s manufacturing economy. We regularly communicate with him and his staff to foster long term growth and economic development for this underutilized portion of the city. A significant amount of time, effort and dialogue has occurred with this administration regarding how New Boston Food Market can participate in this activation, including identifying a new home for our thriving businesses within the City. We are bewildered that MassDOT, and the Secretary of EEA continue to ignore our concerns, and ignore the efforts of the Mayor and his staff by including Widett Circle for a layover site, a terrible use for the point of entry to Boston. We urge MassDOT and the Federal Railroad Administration to recognize NBFM as one of the most important manufacturing assets in the City of Boston. We demand MassDOT to deem Widett Circle impractical for its considered use, and eliminate it from further consideration as a layover site. We would like to get back to business without the fear that your agency is going to take our property.”</p>	<p>air-rights development. This would require decking over any future layover yard to provide a ground plane to build on. The proposed design of the Widett Circle layover facility can accommodate and does not preclude future air rights development opportunities, which are outside the scope of this project. As any City efforts advance, MassDOT/MBTA will continue to coordinate with the City to help realize a future development vision for Widett Circle.</p> <p>MassDOT and the City of Boston have created a Joint Development Working Group to conduct focused analysis on future opportunities in this area.</p>
<p><b>Environmental/ Socioeconomic Consequences (Widett Circle)</b></p>	<p><b>Public</b></p>	<p><b>Commenter (David Sindel):</b> “... The layover facility should include decking (suitable for mid-rise development) and any necessary provisions for future pedestrian/bike connections to Dorchester Avenue and Albany Street. This would provide the best of both worlds - the best possible layover facility, as well as space for development to increase Boston's tax base and housing stock - and the sale of air rights could pay for the decking...”</p>	<p>FRA and MassDOT understand that the City of Boston is considering Widett Circle as a potential location for future air-rights development. This would require decking over any future layover yard in order to provide a ground plane on which to build. The proposed design of the Widett Circle layover facility can accommodate and does not preclude future air rights development opportunities. However actual construction of infrastructure to facilitate that development (such as a platform (deck) over the Widett Circle yard) is outside the scope of this project. MassDOT and the City of</p>



**South Station Expansion (SSX) Project**  
**Responses to Comments on the April 2017 Draft Environmental Assessment**  
**and Draft Section 4(f) Determination**  
 September 29, 2017

Topic	Category	Summary of Comment	Response
			Boston have created a Joint Development Working Group to conduct focused analysis on future opportunities in this area.
<b>Environmental/ Socioeconomic Consequences (Widett Circle)</b>	<b>Resource and Regulatory Agencies, and Elected Officials</b>	<b>Commenter (Massport):</b> Requests plans for Widett Circle be designed to maintain full capacity of the South Boston Bypass Road (which is incorrectly labelled as the “Massport Haul Road” on included plans) in order to preserve critical freight access to and from South Boston Waterfront.	FRA and MassDOT acknowledge this comment and have corrected this label on EA Figures S-3 and 2-5, as well as future plans. The SSX project design does not impact the bridge piers and would maintain full capacity of the South Boston Bypass Road in the vicinity of Widett Circle.
<b>General Support</b>	<b>Other Interested Stakeholders</b>	<b>Commenter (A Better City):</b> General support for the South Station Expansion project. “...We believe that the South Station expansion is a critical component in the multi-modal transportation network of the state, the region, and the Northeast Corridor. Advancement of this project will provide significant benefits for the transportation, economic, and environmental health and vitality of the region....”	Thank you for your comment.
<b>General Support</b>	<b>Other Interested Stakeholders</b>	<b>Commenter (Drew Company):</b> General support for the South Station Expansion project. “South Station expansion is a critical component in the multi-modal transportation network of the state, the region, and the Northeast Corridor. Advancement of this project will provide significant benefits for the transportation, economic, and environmental health and vitality of the region. ...”	Thank you for your comment.
<b>General Support</b>	<b>Other Interested Stakeholders</b>	<b>Commenter (Massachusetts Convention Center Authority):</b> General support for the South Station Expansion project. “The additional capacity that will be realized by the expansion of South Station is both key to the Commonwealth’s efforts to expand its multimodal transportation network, while enhancing the capacity and viability of the Northeast Corridor. ...The findings of the [South Boston Waterfront Sustainable Transportation Plan] report supported the South Station Expansion project in order to provide additional high quality transit access and improved pedestrian and bicycle access to the [Boston Convention & Exhibition Center] and South Boston Waterfront. The South Station Expansion Project is necessary to accommodate the expected increase in overall transit demand in the South Boston Waterfront as well as Boston’s central business district. ... The South Station Expansion Project will deliver considerable transit, mobility, environmental, and economic development benefits and the City of Boston, the Commonwealth and the region will be better served when this project is completed. ...”	Thank you for your comment.



**South Station Expansion (SSX) Project  
Responses to Comments on the April 2017 Draft Environmental Assessment  
and Draft Section 4(f) Determination  
September 29, 2017**

<b>Topic</b>	<b>Category</b>	<b>Summary of Comment</b>	<b>Response</b>
<b>General Support</b>	<b>Public</b>	<b>Commenter (Deborah Wrighton-Wex):</b> General support for improvements to South Station and opening Dorchester Avenue for public access. Also, in support of a future connection between South Station and North Station.	Thank you for your comment.
<b>General Support</b>	<b>Public</b>	<b>Commenter (Jon Jutstrom):</b> General support for the South Station Expansion project. “The project needs to happen for all of the commuters who currently suffer from lack of investment and for the future generations who will inherit an infrastructure that is ill equipped to handle daily travel. Commuting to South Station daily on the commuter rail, I witness massive losses of productivity due to delays, missed meetings, etc. On the way home, we are continuously late and miss time with our children. If the daily lives of our citizens is not improved, the migration of young people will continue to leave the state, leaving us without a sufficient tax base to support the state in the future. Shorter-term, an improved commuter experience would bolster revenues for the MBTA. I know plenty of people who hate driving to work but it’s the lesser of two evils. The environmental benefit of taking cars off the road is obvious. Do the right thing and build it, they will come.”	Thank you for your comment.
<b>General Support</b>	<b>Public</b>	<b>Commenter (Lawrence DiCara):</b> General support for the South Station Expansion project. “Expanding So. Station is essential to the future of our state. All of us who care about the future of Eastern MA understand that expanding So. Station is important. That’s why ABC and other organizations have stepped up in support.”	Thank you for your comment.
<b>General Support/ Support for Other Initiatives (North South Rail Link)</b>	<b>Public</b>	<b>Commenter (David Sindel):</b> “...The layover facility and interlocking reconfiguration should be designed to not preclude the future construction of the North-South Rail Link. While the projects are often presented in opposition, in fact they are complementary. Both are necessary to allow the rail system to support an expanded mix of high-frequency local service, traditional commuter rail service, intercity service, and high-speed rail service to connect the region, the Commonwealth, and the entire Northeast. SSX should be treated as the first phase of a multi-decade downtown rail expansion that will also include the NSRL...”	Thank you for your comment. FRA and MassDOT have designed the SSX project so as not to preclude the goals of the NSRL project, including the opportunity for future underground infrastructure, such as tunnel portals and station locations contemplated in NSRL. MassDOT is conducting a study, separate from the SSX project, to re-evaluate the NSRL cost estimates and benefits to riders. This study is anticipated to be completed by Spring 2018.



**South Station Expansion (SSX) Project**  
**Responses to Comments on the April 2017 Draft Environmental Assessment**  
**and Draft Section 4(f) Determination**  
 September 29, 2017

Topic	Category	Summary of Comment	Response
<b>Support for Other Initiatives</b>	<b>Public</b>	<b>Commenter (Jameson Brown):</b> “If the MBTA ran more frequent service on the commuter rail all day, they wouldn’t need as much space to store trains, because those trains would be in use. While running more trains costs more, it needs to be evaluated against the cost of acquiring, building, and maintaining the extra lay-over facilities. There are also steps the MBTA can take to lower the cost of running the commuter rail trains, such as 1 person operation. Even without that, running a train isn’t particularly expensive compared to the capital costs of the equipment, which clearly already exists. MassDOT needs to consider more frequent, all-day service in its alternatives analysis, especially regarding layover facilities.”	FRA and MassDOT did consider future service increases, as described in EA Chapter 2, in examining alternatives to expand South Station. MassDOT will analyze potential future service alternatives as part of a new MassDOT initiative, expected to commence later this year. Both capital and operating costs are important considerations in commuter rail service planning.
<b>Support for Other Initiatives (I-90 Allston Interchange Project)</b>	<b>Public</b>	<b>Commenter (Dr. Robin Pope):</b> Advocate for The Massachusetts Healthy Transportation Compact. Provided comments relevant to I-90 Allston Interchange Project, currently underway by MassDOT.	Thank you for your comment. Beacon Park Yard (BPY) in Allston, previously identified as a third layover facility alternative in the SSX EA and DEIR, is now subject to environmental review as part of the I-90 Allston Interchange Improvement project (I-90 project) (Executive Office of Energy and Environmental Affairs (EEA No. 15278). MassDOT is further refining the concept design and proceeding through the state environmental review process of BPY as part of the I-90 project. Although the NEPA class of action has not been formally identified, MassDOT anticipates that the I-90 project, including BPY, will be reviewed as an EA and will be led by the Federal Highway Administration (FHWA). MassDOT will share your comment with the I-90 project team.
<b>Support for Other Initiatives (North South Rail Link)</b>	<b>Other Interested Stakeholders</b>	<b>Commenter (Brian Gregory):</b> General support for the North South Rail Link project. “...While the expansion project is admirable in its goals, an increase in the stub-end operation currently being employed only serves to kick the metaphorical can down the road, as well as failing to address eventual capacity issues at North Station. ...The project necessitates the taking of the Post Office buildings, and replacing the majority of their square footage with tracks, leaving only a minimal strip for development. A revitalized Dorchester Avenue would be much better served by buildings that can take full advantage of the depth of those parcels, without having their first 3 floors compromised by rail-related functions. ...Additionally concerning are the large	Key purposes of the SSX project include expanding the South Station Rail Terminal to enable growth in passenger rail transportation along the NEC; improving service reliability through updates to rail infrastructure and related layover capacity; and improving passenger capacity and experience of using South Station.  FRA is required under NEPA and its implementing regulations to analyze reasonable alternatives to the proposed action, including the analysis of no action. The scope of the SSX project did not include consideration of a link between South Station and North Station as a



**South Station Expansion (SSX) Project**  
**Responses to Comments on the April 2017 Draft Environmental Assessment**  
**and Draft Section 4(f) Determination**  
 September 29, 2017

Topic	Category	Summary of Comment	Response
		<p>areas needed for the layover spaces, something that would be greatly reduced or eliminated by a solution such as the North-South Rail Link. ...As a Massachusetts resident, daily transit user, urban planner, and architect, I believe the North South Rail Link, and not South Station Expansion, is the solution the city, metro region, and state at large needs.”</p>	<p>subterranean connection between North and South Station, as this could not be a reasonable alternative to meet the purpose and need for the SSX project.</p> <p>FRA and MassDOT have designed the SSX project so as not to preclude the goals of the NSRL project, including the opportunity for future underground infrastructure, such as tunnel portals and station locations contemplated in NSRL. MassDOT is conducting a study, separate from the SSX project, to re-evaluate the NSRL cost estimates and benefits to riders. This study is anticipated to be completed by Spring 2018.</p>
<p><b>Support for Other Initiatives (North South Rail Link)</b></p>	<p><b>Other Interested Stakeholders</b></p>	<p><b>Commenter (North South Rail Link Working Group):</b> “...But at a cost of \$2 billion at South Station alone, and hundreds of millions more needed for additional tracks and bridges at North Station, this plan provides a shockingly poor return on investment and poses a major threat to alternative solutions with far greater and more durable environmental benefit. ... Prior studies have demonstrated that unified rail service will improve the operating efficiency of the rail system and remove tens of thousands of cars from congested highways, reducing air pollution and climate impacts. [NSRL] will encourage more sustainable transit-oriented development across the service area. On environmental grounds alone, permitting for SSX should not proceed until its environmental impacts have been thoroughly and carefully weighed against the North South Rail Link alternative, in the form of a full FEIS [Final Environmental Impact Statement] for both projects. ...”</p>	<p>Based on the analysis in the EA, FRA finds that the SSX project will have no foreseeable significant impact on the quality of the human or natural environment, and that therefore, an environmental impact statement (EIS) is not required.</p> <p>Key purposes of the SSX project include expanding the South Station Rail Terminal to enable growth in passenger rail transportation along the NEC; improving service reliability through updates to rail infrastructure and related layover capacity; and improving passenger capacity and experience of using South Station. FRA is required under NEPA and its implementing regulations to analyze reasonable alternatives to the proposed action, including the analysis of no action. The scope of the SSX project did not include consideration of a link between South Station and North Station as a subterranean connection between North and South Station, as this could not be a reasonable alternative to meet the purpose and need for the SSX project.</p> <p>FRA and MassDOT have designed the SSX project so as not to preclude the goals of the NSRL project, including the opportunity for future underground infrastructure, such as tunnel portals and station locations contemplated in NSRL. MassDOT is conducting a study, separate from the SSX project, to re-evaluate the NSRL cost estimates and benefits</p>



**South Station Expansion (SSX) Project**  
**Responses to Comments on the April 2017 Draft Environmental Assessment**  
**and Draft Section 4(f) Determination**  
 September 29, 2017

Topic	Category	Summary of Comment	Response
<b>Support for Other Initiatives (North South Rail Link)</b>	<b>Other Interested Stakeholders</b>	<p><b>Commenter (The Citizens Advisory Committee for the North South Rail Link Project):</b> "...The No-Build option to SSX is not simply doing nothing, which everyone agrees is an untenable course of inaction; rather it is doing something else - i.e., the North South Rail Link (NSRL) Project. ... Federal statutes mandate that environmental review of major projects include the analysis of all reasonable alternatives. ... MassDOT has now commissioned a new NSRL Feasibility Study that is scheduled to get underway within a matter of days. If properly done, that study can provide the information needed to support a No-Build analysis for the SSX Project that would supplement what has already been done in the Draft EA. Before we commit \$2B to what may prove to be a relatively temporary and incomplete transportation solution, not to mention one with great opportunity costs from a development perspective, a thoughtful comparison of these two alternatives is the only prudent and responsible approach. ... We are aware that some have suggested that the SSX/NSRL comparison need not be a priority because moving ahead with SSX now does not preclude moving ahead with the NSRL at some future date. We strongly disagree with that assumption on its merits and as a practical matter. If \$2B is spent to expand surface tracks at South Station, there will be neither the public capacity nor the popular appetite for another multi-billion-dollar project in the same vicinity, especially one that will effectively undo what its predecessor has just done."</p>	<p>to riders. This study is anticipated to be completed by Spring 2018.</p> <p>FRA is required under NEPA (42 U.S.C. 4321 et seq.) and its implementing regulations (40 CFR Parts 1500-1508) to analyze reasonable alternatives, including the analysis of no action. The no action alternative is sometimes referred to as the "No Build Alternative." FRA and MassDOT have defined the No Build Alternative for the South Station Expansion Project, stated in EA Section 2.3, as the "existing transportation facilities and services and all future funded transportation improvement projects in the vicinity of South Station." The No Build Alternative for the SSX project represents the base condition against which the future Build Alternative is measured, and does not include consideration of a link between South Station and North Station because the NSRL project did not meet the criteria for inclusion in the No Build Alternative because the NSRL project does not exist and is not a future funded transportation improvement project.</p> <p>FRA and MassDOT have designed the SSX project so as not to preclude the goals of the NSRL project, including the opportunity for future underground infrastructure, such as tunnel portals and station locations contemplated in NSRL. MassDOT is conducting a study, separate from the SSX project, to re-evaluate the NSRL cost estimates and benefits to riders. This study is anticipated to be completed by Spring 2018.</p> <p>The completion of the federal and state environmental reviews for the SSX Project does not mean that other, currently unfunded projects or proposals are eliminated from future consideration in Massachusetts. FRA's grant programs are national in scope, but are primarily state-based in execution; as such, local, regional, and state governmental entities in Massachusetts will need to continue working towards a unified approach on how to address passenger rail capacity in the Boston area.</p>



**South Station Expansion (SSX) Project  
Responses to Comments on the April 2017 Draft Environmental Assessment  
and Draft Section 4(f) Determination**

September 29, 2017

Topic	Category	Summary of Comment	Response
<p><b>Support for Other Initiatives (North South Rail Link)</b></p>	<p><b>Other Interested Stakeholders</b></p>	<p><b>Commenters (North South Rail Link Working Group):</b> “...According to 40 [CFR], [t]he first purpose of an Environmental Assessment is to: “provide sufficient evidence and analysis for determining whether to prepare an environmental impact statement or a finding of no significant impact”. The current Draft Environmental Assessment clearly provides insufficient basis for such a determination. The Working Group therefore respectfully requests that the Draft Environmental Assessment be revised to address all relevant alternatives to terminal expansion, thereby providing sufficient basis for determining whether a full FEIS is required, and further recommends that no further funds be expended on the South Station Expansion Project until such a comprehensive FEIS has been completed in conformance with the requirements of 40 CFR Parts 1500-1508 and other relevant statutes.”</p>	<p>Based on the analysis in the EA, FRA finds that the SSX project will have no foreseeable significant impact on the quality of the human or natural environment, and that therefore, an EIS is not required.</p>
<p><b>Support for Other Initiatives (North South Rail Link)</b></p>	<p><b>Other Interested Stakeholders</b></p>	<p><b>Commenters (Sierra Club Massachusetts Chapter):</b> “...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 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. ...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. ...” The Massachusetts Sierra Club is concerned with air quality impacts, loss of jobs and loss of potential development opportunities at Widett Circle, and project cost.</p>	<p>Based on the analysis in the EA, FRA finds that the SSX project will have no foreseeable significant impact on the quality of the human or natural environment, and that therefore, an EIS is not required.</p> <p>FRA and MassDOT have designed the SSX project so as not to preclude the goals of the NSRL project, including the opportunity for future underground infrastructure, such as tunnel portals and station locations contemplated in NSRL. MassDOT is conducting a study, separate from the SSX project, to re-evaluate the NSRL cost estimates and benefits to riders. This study is anticipated to be completed by Spring 2018.</p> <p>In regard to loss of jobs and development at Widett Circle, the FRA analyzed socioeconomic impacts in the EA Section 3.13, and land use and zoning impacts in the EA Section 3.12. As described in EA Sections 3.12.3 and 3.13.3, MassDOT would provide acquisition and, if required, relocation assistance for affected property owners at the Widett Circle layover facility site in accordance with the procedures outlined in the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970.</p>



**South Station Expansion (SSX) Project  
 Responses to Comments on the April 2017 Draft Environmental Assessment  
 and Draft Section 4(f) Determination  
 September 29, 2017**

Topic	Category	Summary of Comment	Response
			<p>FRA and MassDOT understand that the City of Boston is considering Widett Circle as a potential location for future air-rights development. The proposed design of the Widett Circle layover facility can accommodate and does not preclude future air rights development opportunities. However actual construction of infrastructure to facilitate that development (such as a platform (deck) over the Widett Circle yard) is outside the scope of this project. MassDOT and the City of Boston have created a Joint Development Working Group to conduct focused analysis on future opportunities in this area.</p> <p>As noted in EA Section 3.2, no adverse air quality impacts are expected to occur as a result of the project.</p>
<p><b>Support for Other Initiatives (North South Rail Link)</b></p>	<p><b>Public</b></p>	<p><b>Commenter (Frank S. DeMasi):</b> General support for the North South Rail Link project. "...I cannot support the proposed South Station Expansion Project that I believe will not solve current and future capacity requirements at the station. ...One of the alternatives in the SSX DEA should have been a no-build alternative with the North South Rail Link considered as a strategic cost-effective solution for current and future capacity short fall inherent with the existing and proposed stub end terminal. The costs associated with the construction of added tracks and platforms would be better spent on the alternative North South Rail Link...."</p>	<p>FRA is required under NEPA (42 U.S.C. 4321 et seq.) and its implementing regulations (40 CFR Parts 1500-1508) to analyze reasonable alternatives, including the analysis of no action. The no action alternative is sometimes referred to as the "No Build Alternative." FRA and MassDOT have defined the No Build Alternative for the SSX project, stated in EA Section 2.3, as the "existing transportation facilities and services and all future funded transportation improvement projects in the vicinity of South Station." The No Build Alternative for the SSX project represents the base condition against which the future Build Alternative is measured, and does not include consideration of a link between South Station and North Station because the NSRL project did not meet the criteria for inclusion in the No Build Alternative because the NSRL project does not exist and is not a future funded transportation improvement project.</p> <p>FRA and MassDOT have designed the SSX project so as not to preclude the goals of the NSRL project, including the opportunity for future underground infrastructure, such as tunnel portals and station locations contemplated in NSRL. MassDOT is conducting a study, separate from the SSX project, to re-evaluate the NSRL cost estimates and benefits</p>



**South Station Expansion (SSX) Project  
Responses to Comments on the April 2017 Draft Environmental Assessment  
and Draft Section 4(f) Determination**  
September 29, 2017

Topic	Category	Summary of Comment	Response
<b>Support for Other Initiatives (North South Rail Link)</b>	<b>Public</b>	<p><b>Commenter (Jameson Brown):</b> ... “[With the NSRL,] train throughput is vastly increased in both directions. This solves the same problem at North Station, where they currently don’t have quite as much constraint as South Station, but don’t have any space to expand as Commuter Rail use grows. The NSRL will also address some of the inadequate station facilities by constructing new underground stations... People boarding and alighting would use the new facilities, reducing the crowding in South Station. With trains having an easy pass-through to the other side of the commuter rail system, large layover facilities near the center of the city, i.e. on expensive land that MassDOT or the MBTA could instead lease out, would be unnecessary. What facilities would be needed could be placed farther out, where land is cheaper and impacts less severe. ... MassDOT and the MBTA need to look at the NSRL when assessing the alternatives to South Station Expansion.”</p>	<p>to riders. This study is anticipated to be completed by Spring 2018.</p> <p>Key purposes of the SSX project include expanding the South Station Rail Terminal to enable growth in passenger rail transportation along the NEC; improving service reliability through updates to rail infrastructure and related layover capacity; and improving passenger capacity and experience of using South Station.</p> <p>FRA is required under NEPA and its implementing regulations to analyze reasonable alternatives to the proposed action, including the analysis of no action. The scope of the SSX project did not include consideration of a link between South Station and North Station as a subterranean connection between North and South Station, as this could not be a reasonable alternative to meet the purpose and need for the SSX project.</p> <p>FRA and MassDOT have designed the SSX project so as not to preclude the goals of the NSRL project, including the opportunity for future underground infrastructure, such as tunnel portals and station locations contemplated in NSRL. MassDOT is conducting a study, separate from the SSX project, to re-evaluate the NSRL cost estimates and benefits to riders. This study is anticipated to be completed by Spring 2018.</p>
<b>Support for Other Initiatives (North South Rail Link)</b>	<b>Public</b>	<p><b>Commenter (Karen Taylor):</b> Supports reopening of Dorchester Avenue. General support for the North South Rail Link project.</p>	<p>Thank you for supporting the reopening of Dorchester Avenue. Key purposes of the SSX project include to expand the South Station Rail Terminal to enable growth in passenger rail transportation along the NEC; improve service reliability through updates to rail infrastructure and related layover capacity, improve passenger capacity and experience of using South Station; and allow for Dorchester Avenue to be reopened for public use and enjoyment.</p> <p>FRA is required under NEPA and its implementing regulations to analyze reasonable alternatives to the proposed action, including the analysis of no action. The</p>



**South Station Expansion (SSX) Project  
 Responses to Comments on the April 2017 Draft Environmental Assessment  
 and Draft Section 4(f) Determination  
 September 29, 2017**

Topic	Category	Summary of Comment	Response
			<p>scope of the SSX project did not include consideration of a link between South Station and North Station as a subterranean connection between North and South Station, as this could not be a reasonable alternative to meet the purpose and need for the SSX project.</p> <p>FRA and MassDOT have designed the SSX project so as not to preclude the goals of the NSRL project, including the opportunity for future underground infrastructure, such as tunnel portals and station locations contemplated in NSRL. MassDOT is conducting a study, separate from the SSX project, to re-evaluate the NSRL cost estimates and benefits to riders. This study is anticipated to be completed by Spring 2018.</p>
<p><b>Support for Other Initiatives (North South Rail Link)</b></p>	<p><b>Public</b></p>	<p><b>Commenters (Steven Olanoff):</b> "...I join them asking for a full FEIS to be conducted to study the North South Rail Link as an alternative to the SSX...The vast economic benefits of the NSRL compared with the very doubtful net gains of the SSX would come out in such a study and, I think, demonstrate that the SSX project should be dropped in favor of the NSRL....Given the transportation funding problems in the Commonwealth, we should not be wasting any money or time in pursuing the literal dead-end solution of South Station expansion. Going with an FEIS that compares the two projects would settle this matter in the accepted manner and enable us to move forward with a viable solution to the critical transportation problems that face our region."</p>	<p>Based on the analysis in the EA, FRA finds that the SSX project will have no foreseeable significant impact on the quality of the human or natural environment, and that therefore, an EIS is not required.</p> <p>Key purposes of the SSX project include expanding the South Station Rail Terminal to enable growth in passenger rail transportation along the NEC; improving service reliability through updates to rail infrastructure and related layover capacity; and improving passenger capacity and experience of using South Station. FRA is required under NEPA and its implementing regulations to analyze reasonable alternatives to the proposed action, including the analysis of no action. The scope of the SSX project did not include consideration of a link between South Station and North Station as a subterranean connection between North and South Station, as this could not be a reasonable alternative to meet the purpose and need for the SSX project.</p> <p>FRA and MassDOT have designed the SSX project so as not to preclude the goals of the NSRL project, including the opportunity for future underground infrastructure, such as tunnel portals and station locations contemplated in NSRL. MassDOT is conducting a study, separate from the SSX</p>



**South Station Expansion (SSX) Project**  
**Responses to Comments on the April 2017 Draft Environmental Assessment**  
**and Draft Section 4(f) Determination**  
 September 29, 2017

Topic	Category	Summary of Comment	Response
			<p>project, to re-evaluate the NSRL cost estimates and benefits to riders. This study is anticipated to be completed by Spring 2018.</p>
<p><b>Support for Other Initiatives (North South Rail Link)</b></p>	<p><b>Resource and Regulatory Agencies, and Elected Officials</b></p>	<p><b>Commenters (Former Governor of Massachusetts Michael S. Dukakis):</b> "...Federal statutes mandate that environmental review of major projects include the analysis of all reasonable alternatives. This is meant to assure that major investment decisions are made objectively, fairly and wisely; and it is most unfortunate that the Draft EA for SSX has systematically ignored and even dismissed its most obvious and compelling alternative – i.e., the unification of our regional rail system. ...Some have suggested that the SSX/NSRL comparison need not be a priority because moving ahead with SSX now does not preclude moving ahead with the NSRL at some future date. But I strongly disagree with the assumption on its merits and as a practical matter. If \$2B is spent to expand surface tracks at South Station, there will be neither the public capacity nor the popular appetite for another multi-billion-dollar project in the same vicinity, especially one that will effectively undo what its predecessor has just done. ...To that end, I hereby recommend and request that a full DEIR/DEIS be done for the South Station Expansion Project."</p>	<p>Based on the analysis in the EA, FRA finds that the SSX project will have no foreseeable significant impact on the quality of the human or natural environment, and that therefore, an EIS is not required.</p> <p>Key purposes of the SSX project include expanding the South Station Rail Terminal to enable growth in passenger rail transportation along the NEC; improving service reliability through updates to rail infrastructure and related layover capacity; and improving passenger capacity and experience of using South Station. FRA is required under NEPA and its implementing regulations to analyze reasonable alternatives to the proposed action, including the analysis of no action. The scope of the SSX project did not include consideration of a link between South Station and North Station as a subterranean connection between North and South Station, as this could not be a reasonable alternative to meet the purpose and need for the SSX project.</p> <p>FRA and MassDOT have designed the SSX project so as not to preclude the goals of the NSRL project, including the opportunity for future underground infrastructure, such as tunnel portals and station locations contemplated in NSRL. MassDOT is conducting a study, separate from the SSX project, to re-evaluate the NSRL cost estimates and benefits to riders. This study is anticipated to be completed by Spring 2018.</p> <p>The completion of the federal and state environmental reviews for the SSX Project does not mean that other, currently unfunded projects or proposals are eliminated from future consideration in Massachusetts. FRA's grant programs are national in scope, but are primarily state-based in execution; as such, local, regional, and state governmental</p>



**South Station Expansion (SSX) Project  
Responses to Comments on the April 2017 Draft Environmental Assessment  
and Draft Section 4(f) Determination**  
September 29, 2017

Topic	Category	Summary of Comment	Response
			entities in Massachusetts will need to continue working towards a unified approach on how to address passenger rail capacity in the Boston area.

## **Comments Received on the Draft EA and Draft Section 4(f) Determination**

This Page Intentionally Left Blank

## Nancy Farrell

---

**From:** Woelfel, Steve (DOT) <steve.woelfel@state.ma.us>  
**Sent:** Wednesday, April 26, 2017 8:56 PM  
**To:** Nancy Farrell; Regan Checchio  
**Cc:** Paul Godfrey  
**Subject:** Fwd: South Station expansion

Sent from my iPhone

Begin forwarded message:

**From:** Karen Taylor [REDACTED]  
**Date:** April 26, 2017 at 2:39:28 PM EDT  
**To:** "Woelfel, Steve (DOT)" <[Steve.Woelfel@dot.state.ma.us](mailto:Steve.Woelfel@dot.state.ma.us)>  
**Subject:** South Station expansion

I am commenting on the environmental report for South Station.

The project is so misguided. It will exacerbate Boston's traffic as people try to get between North Station and South Station. It will mean still running trains all around to make space and to get them repaired. It will mean the end of any chance to connect the two stations, which is the real solution to New England's transportation woes.

You'll expand SStation and within a short time it will fill up again and then what will you do? Somebody thought up this idea without understanding how rail works. No other city in the world is expanding a dead-end station. Instead they are making connections.

Open up Dot Avenue. That's just fine. Just don't make a 19th-century station into a 19th century station. This is the 21st century, in case South Station expansion boosters haven't realized it.

Karen

Karen Taylor  
[REDACTED]

## Nancy Farrell

---

**From:** Woelfel, Steve (DOT) <steve.woelfel@state.ma.us>  
**Sent:** Thursday, April 27, 2017 2:10 PM  
**To:** Nancy Farrell; Regan Checchio  
**Cc:** Paul Godfrey  
**Subject:** FW: South Station Expansion

---

**From:** Jameson Brown [REDACTED]  
**Sent:** Thursday, April 27, 2017 1:51 PM  
**To:** Woelfel, Steve (DOT)  
**Subject:** South Station Expansion

Dear Mr. Woelfel,

After reading the Draft Environmental Assessment for the South Station Expansion project, I have to say I am disappointed with the scope of the assessments. I am a [REDACTED] resident, and a Master's of Landscape Architecture student at Boston Architectural College; I have a particular interest in urban planning and transportation.

In short, the Alternatives Analysis completely ignored two important alternatives: the North-South Rail Link, and increased mid-day service.

If the MBTA ran more frequent service on the commuter rail all day, they wouldn't need as much space to store trains, because those trains would be in use. While running more trains costs more, it needs to be evaluated against the cost of acquiring, building, and maintaining the extra lay-over facilities. There are also steps the MBTA can take to lower the cost of running the commuter rail trains, such as 1 person operation. Even without that, running a train isn't particularly expensive compared to the capital costs of the equipment, which clearly already exists. MassDOT needs to consider more frequent, all-day service in its alternatives analysis, especially regarding layover facilities.

The larger, more important point the Alternatives Analysis misses is the potential North-South Rail Link (NSRL). Linking the lines that approach South Station with those that approach North Station promises to solve or massively mitigate many of the problems SSX tries to fix, as well as many others. The document lays out three deficiencies of the current situation in section 1.4: terminal capacity constraints, inadequate station facilities, and insufficient layover space.

- The main thing the NSRL solves is the first one. With the NSRL, South Station would no longer be entirely a terminal facility. Trains would pull in, then instead of having to slowly back out through a congested and complex interlocking full of conflicting movements, they continue in the direction they had started in. Train throughput is vastly increased in both directions. This solves the same problem at North Station, where they currently don't have quite as much constraint as South Station, but don't have any space to expand as Commuter Rail use grows.
- The NSRL will also address some of the inadequate station facilities by constructing new underground stations. (The current proposal calls for three; I think two would work better and be much less expensive.) People boarding and alighting would use the new facilities, reducing the crowding in South Station. And again, the project would do the same for North Station.
- With trains having an easy pass-through to the other side of the commuter rail system, large layover facilities near the center of the city, i.e. on expensive land that MassDOT or the MBTA could instead lease out, would be unnecessary. What facilities would be needed could be placed farther out, where land is cheaper and impacts less severe.

Besides addressing the issues raised in the Environmental Assessment, the NSRL has other benefits. It would allow much more frequent service on all commuter rail lines, making the service useful to more people. With useful service, more people will chose to use the rail system rather than driving alone, one of the most environmentally destructive actions we regularly take. Useful Service will also allow towns along the commuter lines to develop more densely around their stations, lessening sprawl and all the environmental effects thereof. SSX by itself does not allow for much greater increase in frequency, the NSRL does. Furthermore, the NSRL makes transit more useful to people by connecting them to more places, i.e. from south side places to north side places, and vice versa. When transit is useful, people use it, and transit, especially rail transit, is much more environmentally friendly than private automobiles.

MassDOT and the MBTA need to look at the NSRL when assessing the alternatives to South Station Expansion. There has been a growing push for it from our community leaders, architects, planners, and transportation experts. Any alternatives analysis needs to consider this alternative.

Thank you for your time,  
Jameson Brown.

P.S. I don't see why Dorchester Avenue needs to be opened to cars as well as people. I also think that if it is opened to cars, 11 ft lanes are too wide and encourage reckless and dangerous behavior by motorists – 10 ft, or even 9 ft lanes would do fine. I think the best option would be to have it pedestrian/bicycle(/emergency vehicle) only.

## Nancy Farrell

---

**From:** Woelfel, Steve (DOT) <steve.woelfel@state.ma.us>  
**Sent:** Thursday, April 27, 2017 3:15 PM  
**To:** Nancy Farrell; Regan Checchio  
**Cc:** Paul Godfrey  
**Subject:** FW: S. Station Expansion

**From:** WBNA Board [mailto:wbnamail@gmail.com]  
**Sent:** Thursday, April 27, 2017 2:26 PM  
**To:** Woelfel, Steve (DOT)  
**Subject:** S. Station Expansion

Mr. Woelfel,

While I support the improvements needed at S. Station and the promise of opening up Dot Ave., I am concerned that this project will negate the connection of S. Station and N. Station.

Also, I received the notice asking for comments no later than May 27 yesterday. That's a lot of material to review in one day.

Sincerely,

Deborah Wrighton-Wex  


JOHN STELLA



MR. STEVE WOELFEL  
SOUTH STATION EXPANSION PROJECT MGR  
DEPUTY DIRECTOR  
MASSDOT OFFICE OF TRANSPORTATION  
PLANNING  
10 PARK PLAZA  
SUITE 4150  
BOSTON , MA. 02116

---

MAY 2, 2017

DEAR STEVE :

I OPPOSE PROPOSED SOUTH STATION EXPANSION PROJECT BECAUSE THE CURRENT SOUTH STATION IS A HISTORIC OLD TRAIN STATION KNOWN AS "SOUTH STATION" .

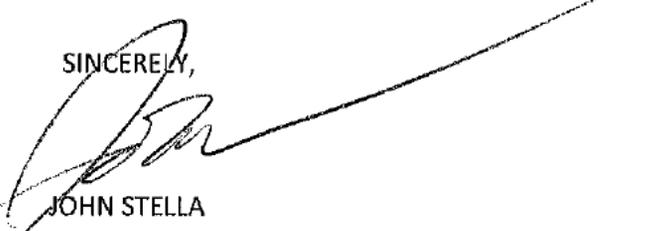
THERE IS ALSO BUS STATION IS NEARBY TRAIN STATION "SOUTH STATION". BOTH BUS STATION AND SOUTH STATION ARE PART OF PUBLIC TRANSPORTATION CENTER ACCESS TO THE TRAVELING PUBLIC .

WE DON'T NEED SOUTH STATION EXPANSION PROJECT , IT IS A WASTE OF TAXPAYER MONEY . SOUTH STATION IS TRAIN STATION AND NEARBY BUS STATION ARE EASY ACCESS TO PUBLIC TRANSIT .

PLEASE DO NOT DEMOLISH THE FAMOUS OLD TRAIN STATION "SOUTH STATION" WHICH IS PART OF PUBLIC TRANSIT ACCESS TO TRAINS AND BUSES .

THANK YOU FOR YOUR CONSIDERATION.

SINCERELY,

  
JOHN STELLA

Use Common Sense!

## Nancy Farrell

---

**From:** Woelfel, Steve (DOT) <steve.woelfel@state.ma.us>  
**Sent:** Tuesday, May 9, 2017 4:56 PM  
**To:** Nancy Farrell  
**Cc:** Paul Godfrey  
**Subject:** Fwd: South Station Expansion

Sent from my iPhone

Begin forwarded message:

**From:** Jon [REDACTED]  
**Date:** May 9, 2017 at 4:40:09 PM EDT  
**To:** "Woelfel, Steve (DOT)" <[Steve.Woelfel@dot.state.ma.us](mailto:Steve.Woelfel@dot.state.ma.us)>  
**Subject:** South Station Expansion

This project needs to happen for all of the commuters who currently suffer from lack of investment and for the future generations who will inherit an infrastructure that is ill equipped to handle daily travel. Commuting to South Station daily on the commuter rail, I witness massive losses of productivity due to delays, missed meetings, etc. On the way home, we are continuously late and miss time with our children. If the daily lives of our citizens is not improved, the migration of young people will continue to leave the state, leaving us without a sufficient tax base to support the state in the future. Shorter-term, an improved commuter experience would bolster revenues for the MBTA, I know plenty of people who hate driving to work but it's the lesser of two evils. The environmental benefit of taking cars off the road is obvious. Do the right thing and build it, they will come.

Jon Jutstrom  
[REDACTED]

## Nancy Farrell

---

**From:** Woelfel, Steve (DOT) <steve.woelfel@state.ma.us>  
**Sent:** Monday, May 22, 2017 4:17 PM  
**To:** Nancy Farrell  
**Cc:** Paul Godfrey  
**Subject:** FW: SSX Draft Environmental Assessment - question

---

**From:** brad bradbells [REDACTED]  
**Sent:** Monday, May 22, 2017 3:49 PM  
**To:** Woelfel, Steve (DOT)  
**Subject:** SSX Draft Environmental Assessment - question

Steve,

In reviewing SSX Draft Environmental Assessment I have not yet found an updated cost estimate. The last one I am aware of is from September 3, 2014 (Technical Appendix Attachments, Table 3, of the TREDIS Methodology discussion).

Given the revisions to the overbuild preparations, the additional egress features, etc. I assume there is a revised estimate. If you can direct me to it, or refer me to someone who can I would be most appreciative.

Thanks,

Brad Bellows

**Brad Bellows Architects**  
[REDACTED]

member NSRL Working Group

# LAWSON & WEITZEN, LLP

ATTORNEYS AT LAW

88 BLACK FALCON AVENUE, SUITE 345  
BOSTON, MASSACHUSETTS 02210-2414

EVAN T. LAWSON (1943-2013)  
RICHARD B. WEITZEN\*  
PAMELA B. BANKERT, PC  
IRA H. ZALEZNIK  
VALERIE L. PAWSON, LLC  
GEORGE F. HAILER, PC\*  
GEORGE E. CHRISTODOULOU, PC  
KENNETH B. GOULD  
JOHN A. TENNARO, PC  
DAVID A. RICH, LLC\*  
PATRICIA L. FARNSWORTH  
K. SCOTT GRIGGS\*\*\*  
MICHAEL J. McDEVITT  
STEVEN M. BUCKLEY

J. MARK DICKISON\*\*  
SONIA K. GUTERMAN, PH.D.  
CAROLINE A. O'CONNELL\*  
GLENN P. FRANK\*  
SCOTT P. LOPEZ  
JEFFREY P. ALLEN  
KENNETH B. SKELLY\*\*\*  
DAVID E. GROSSMAN  
IRVING SALLOWAY  
DARLY G. DAVID  
MARIA GALVAGNA MESINGER  
JONATHAN F. ASH  
LINDA A. OUELLETTE  
JOSHUA M.D. SEOAL\*  
LORI ANN ROUECHE\*

LAUREN J. WEITZEN  
JOHN R. BAUER  
RYAN A. CIPORKIN  
KATHLEEN L. EPPERS  
MICHAEL WILLIAMS  
KRISTINA A. ENGBERG  
DONALD J. GENTILE\*  
ADAM C. LAFRANCE  
KRISTEN BAHMAN MCDONOUGH  
PREETI TANKSALE ARUN  
JUSTIN M. BANKS  
GERARDO SCHIANO\*\*  
PETER A. GRUPP  
BENJAMIN W. O'GRADY  
RACHEL A. MORANDI\*

BOSTON  
TELEPHONE (617) 439-4990  
TELECOPIER (617) 439-3957  
EMAIL: POST@LAWSON-WEITZEN.COM  
WWW.LAWSON-WEITZEN.COM

CAPE COD  
LAWSON, WEITZEN & BANKERT, LLP  
SIX GRANITE STATE COURT  
BREWSTER, MASSACHUSETTS 02631  
TELEPHONE (508) 255-3600

May 25, 2017

**VIA OVERNIGHT MAIL AND EMAIL: [steve.woelfel@state.ma.us](mailto:steve.woelfel@state.ma.us)**

Steve Woelfel

South Station Expansion Project Manager

Deputy Director, MassDOT Office of Transportation Planning

10 Park Plaza, Suite 4150

Boston, Massachusetts 02116

Re: *Boston*

*South Station Expansion Project*

*Draft Environmental Assessment and Draft Section 4(f) Determination*

Dear Mr. Woelfel:

James G. Grant Co., LLC ("Grant") has reviewed the April 2017 Draft Environmental Assessment and Draft Section 4(f) Determination (the "Draft EA") prepared by the U.S. Department of Transportation, the Federal Railroad Administration, and the Massachusetts Department of Transportation concerning the above-referenced matter, and offers these comments concerning the proposed layover facility at Readville – Yard 2. Grant requests that the issues identified below be addressed before the project moves forward.

### *James G. Grant Co., LLC And Proposed Property Taking*

Grant is located at 28 Rear Wolcott Street in Readville (Boston), Massachusetts, which abuts the Readville – Yard 2 proposed location for a layover facility. Overall, Grant's property is comprised of approximately 7.9 acres. In order to construct the proposed layover facility at Readville – Yard 2, MassDOT would have to take .7 acres of Grant's property in Readville. Grant has conducted scrap metal yard operations at this location since 1955. Grant also performs off-site demolition, storage tank dismantling, and operates transfer station facilities for construction and demolition ("C&D") waste, wood waste, yard waste, and tires. Other activities at the facility include heavy equipment and roll off container rentals. Grant services all of New England, and critically is one of only two C&D facilities located in Boston, as discussed further below.

\*ALSO ADMITTED IN NY

\*\*ALSO ADMITTED IN NH

\*\*\*ONLY ADMITTED IN PA

\*ALSO ADMITTED IN DC

\*\*ALSO ADMITTED IN CT

\*\*\*ALSO ADMITTED IN RI, CT, & NH

## LAWSON & WEITZEN, LLP

The cost of the necessary taking associated with Readville – Yard 2 has not been identified. The impacts of that taking should be further explored, both in terms of costs and impacts to long-term employment as well as related environmental consequences, as discussed further below.

### *The Readville – Yard 2 Layover Will Have A Direct Negative Impact On Long Term Employment In The Community As Well As Related Environmental Impacts*

The Draft EA finds that no long term loss of employment will occur as the result of taking .7 acres from Grant, necessary to construct the Readville – Yard 2 Layover. This statement is unsupported and inaccurate, however, and should be more rigorously addressed. Taking of .7 acres of Grant's property – nearly ten percent of its property – will force Grant to greatly downscale its operations or cease operations altogether. A successful C&D and waste business, such as Grant's, requires sufficient land to conduct its operations. Removal of 10% of its land will force Grant to curtail its operations – there is simply no room to move its operations elsewhere on its property. While the Draft EA suggests that relocation aid will be given to Grant, it is tremendously difficult to site a waste and transfer business; Grant cannot locate a suitable replacement site in the vicinity. Even if such a site were able to be located, Grant has expended considerable resources to design its existing facility to address unique components and features of its current, long-term location; any move to a different site would be financially impossible at this time.

Grant's employees receive special training to handle waste materials and to detect unacceptable wastes. These skills are specific to C&D transfer businesses and cannot be utilized elsewhere. Should Grant's operations be shut down, these employees would have to acquire new marketable skills in order to gain new employment elsewhere. The risk of long term loss of employment as the result of constructing the Readville – Yard 2 layover facility is significant.

Curtailling Grant's operation will have repercussions throughout New England. Grant handles much of greater Boston's C&D waste, and is a clean, well-maintained, environmentally sound state-of-the-art facility. If Grant curtails or ceases its operations, C&D waste generated by the city and region will have to be trucked and disposed of, at great expense, in landfills outside the region and state. Those costs would increase operating expenses for contractors, both large and small, and would eventually be passed along to consumers. If a suitable facility cannot be found within reasonable transportation distance, the waste may be dumped illegally.

In 2006, the Commonwealth passed regulations that banned the disposal of specific commonly-used C & D waste materials including asphalt pavement, brick, concrete, metal, and wood. That ban is significant because those materials must now be recycled. Consequently, this has and will continue to increase the volume of debris that needs to be recycled, thereby creating a demand for additional handling facilities in Boston. It is critical that Grant continue to operate at full capacity in order to ensure that there is sufficient recycling capacity to meet the city's and region's growing needs.

## LAWSON & WEITZEN, LLP

Ultimately, should the property be taken and Grant curtail its operations, Grant will be forced to downsize or eliminate its employee force. Such a business curtailment would have far-reaching environmental ramifications across the region. The analysis contained in the Draft EA is quite flawed and should be studied more thoroughly.

### Wetlands Issues and Related Environmental Issues Must Be Further Studied

According to the Draft EA, it is unknown whether or not isolated vegetated wetlands at the Readville – Yard 2 site are within the jurisdiction of the Clean Water Act, requiring a Section 404 permit. This is an important determination that potentially limits development at the site. Additionally, while the Draft EA correctly states that wetlands at the site fall within the jurisdiction of the Boston Conservation Commission, it has not fully addressed the impacts of the proposed development on those wetlands. Similarly, portions of the site lie within the 100-foot buffer zone and 25-foot riverfront area as defined in the Massachusetts Wetlands Protection Act and associated regulations. The proposed project must be designed to conform to performance standards contained in the Massachusetts Wetlands Protection Act and its associated regulations, where applicable. These issues have not been addressed by the Draft EA.

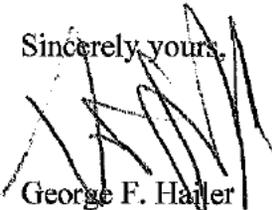
Additionally, impervious areas at the Readville – Yard 2 site will be increased by two acres, a significant expansion of impervious areas. As a result, runoff amounts will increase with development of the proposed layover facility, further impacting the already-compromised Neponset River. The impact of the increased runoff on water quality should be further analyzed.

Moreover, the scope of drainage pipes at Readville – Yard 2 is unknown. Underdrains at the site discharge to the Neponset River, which is already impaired. The current conditions of those drainage pipes are unknown, and more evaluation is needed in order to determine necessary design issues. These drainage issues should be fully addressed.

Overall, there are numerous unresolved issues at Readville – Yard 2. It is impossible to fully and comprehensively evaluate the impacts of the proposed layover absent a full understanding of wetlands, drainage, and water and sewer issues. These issues must be addressed.

Grant appreciates the opportunity to comment on the proposed Readville – Yard 2 Layover. Thank you for your attention to this matter.

Sincerely yours,



George F. Haller



Mashpee Wampanoag Tribe  
Section 106 Review  
Consultation Response Form

Project Docket Number:	South Station Expansion Assessment
Consultant/Environmental Firm:	MassDOT/NEPA
Address or Location Description:	South Station
City, State:	Boston MA
Point of Contact	Stephen Woelfel

Response: May 25, 2017

- We have no concerns related to the proposed project. MWT anticipates no adverse effects to our sites of cultural significance, by you or your client.
- The MWT considers this project in compliance with the MWT's section 106 review process with agreed upon mitigations measures.
- This site will require the on-site presence of a Tribal Cultural Resource Monitor during ground disturbing activities. Contact the Compliance Review Supervisor with construction schedule.
- This project has the potential to have "adverse effects" to historic or cultural resources important to our tribe. We recommend the following actions:

This consultation process is in compliance to the National Historic Preservation Act of 1966 and all relevant amendments including but not limited to section 106 and 36 CFR 800.

**Condition:** In the case that unanticipated discoveries of archeological resources or human remains are found during construction, **you must immediately stop construction and notify our office.**

Ramona Peters, Compliance Review Supervisor  
Tribal Historic Preservation Officer

**Nancy Farrell**

---

**From:** Woelfel, Steve (DOT) <steve.woelfel@state.ma.us>  
**Sent:** Thursday, May 25, 2017 4:30 PM  
**To:** Nancy Farrell; Regan Checchio  
**Cc:** Paul Godfrey; Wickham-Zimmerman, Kristine  
**Subject:** FW: South Station Expansion

**From:** DiCara, Lawrence [REDACTED]  
**Sent:** Thursday, May 25, 2017 4:07 PM  
**To:** Woelfel, Steve (DOT)  
**Subject:** South Station Expansion

Expanding So. Station is essential to the future of our state. All of us who care about the future of Eastern MA understand that expanding So. Station is important. That's why ABC and other organizations have stepped up in support. -  
Isd

**Lawrence S. DiCara**

[REDACTED]

Please consider the environment before printing this email.

[REDACTED]

## Nancy Farrell

---

**From:** Woelfel, Steve (DOT) <steve.woelfel@state.ma.us>  
**Sent:** Thursday, May 25, 2017 4:58 PM  
**To:** Nancy Farrell; Regan Checchio  
**Cc:** Paul Godfrey; Wickham-Zimmerman, Kristine  
**Subject:** FW: A Letter In Opposition To The Proposed South Station Expansion

---

**From:** Timothy Pappas [mailto:tpappas@papent.com]  
**Sent:** Thursday, May 25, 2017 4:49 PM  
**To:** Woelfel, Steve (DOT)  
**Cc:** Andrew Pappas  
**Subject:** A Letter In Opposition To The Proposed South Station Expansion

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

Dear Mr. Woelfel:

As the CEO of a fourth generation family-owned and operated business in Boston, I am especially sensitive to the issues surrounding transportation and traffic. Our family moved its headquarters to the waterfront in 1947, before anyone even considered the area a part of South Boston. Since then, we have been an extremely supportive advocate of the development, despite the lack of proper planning for traffic.

As important as the South Station Expansion Plan is to Governor Baker and others in the Commonwealth, we have an equally passionate desire to see the Post Office stay well away from ANY location that is in South Boston. Because your plan fails to address this concern and in fact, treats their move to Summer Street as being pre-ordained, I am here to tell you that you have many opponents.

The Post Office will harm many small businesses in South Boston by adding a crippling level of truck traffic and resulting pollution level increases.

Any environmental impact study that fails to address this concern should be dismissed as incomplete and biased.

I am therefore writing to express my concerns to you and to the Governor, as well as to the Federal Government, as it seems no one is talking about the real impact that the South Station Expansion Plan will have on our community.

I want to also let you know that there are many business owners who will fight rigorously to prevent the Post Office coming farther into South Boston, even if that means the South Station Expansion cannot move ahead.

If there is a forum to discuss alternatives for the Post Office, we would be pleased to have a seat at the table for those discussions and would re-consider our position on the Expansion.

Sincerely,

Timothy A. Pappas, Ceo  
Pappas Enterprises, Inc.  
655 Summer Street  
Boston, MA 02210  
(617) 330-9797  
(617) 439-9717 FAX  
[tpappas@papent.com](mailto:tpappas@papent.com)

This message may not represent the official position of Pappas Enterprises, Inc., or its management. All correspondence is for the intended recipient only and may be considered confidential. The document(s) included with this electronic mail transmission contain information which may be confidential and/or privileged. This information is intended to be for the use of the addressee only. Any disclosure, printing, photocopying, distribution or use of the contents of this e-mailed information by persons other than the addressee or an agent of the addressee, is unauthorized and prohibited. If you have received this electronic mail in error, please notify us via electronic mail reply to the sender or by telephone (collect 617-330-9797) immediately.

**THE CITIZENS ADVISORY COMMITTEE  
FOR THE NORTH SOUTH RAIL LINK PROJECT**

May 26, 2017

Stephen Woelfel, Deputy Director  
MassDOT Office of Transportation Planning  
Project Manager for the South Station Expansion Project  
State Transportation Building  
Ten Park Plaza  
Boston, MA 02116

**RE: Draft Environmental Assessment (EA) for the South Station Expansion Project**

Dear Director Woelfel,

One of the notable advantages of a full-fledged state and federal environmental review process for the South Station Expansion (SSX) Project -- i.e., an Environmental Impact Report (DEIR) -- would be the comparison of SSX to its alternative. The so-called No-Build alternative often gets short shrift; but in this case, it is essential to understanding the SSX Project, and more specifically, whether this project is necessary at all. The No-Build option to SSX is not simply doing nothing, which everyone agrees is an untenable course of inaction; rather it is doing something else -- i.e., the North South Rail Link (NSRL) Project. What is needed now is a systematic comparison of these two alternatives; and that comparison is conspicuous by its absence in the Draft EA.

This is more than just a procedural preference; it is a requirement. Federal statutes mandate that environmental review of major projects include the analysis of all reasonable alternatives. This is meant to assure that major investment decisions are made objectively, fairly and wisely; and it is most unfortunate that the Draft EA for SSX has systematically ignored and even dismissed its most obvious and compelling alternative -- i.e., the unification of our regional rail system. More than an oversight, that is a fatal flaw in the EA process and the product that is now before us for review and comment.

It should be noted that the NSRL Citizens Advisory Committee has been quite consistent in its advocacy for a realistic and objective No-Build in this case as we were for the 2003 DEIR/DEIS in the case of the North/South Rail Link itself. Throughout that lengthy process, the CAC argued publicly and continually for serious attention to the No-Build alternative precisely because we understood that that alternative would evolve into what has since become the \$2B SSX Project. Over the expressed objection of the CAC, MassDOT and the MBTA decided not to address the relative costs and benefits of surface track expansion then, perhaps because the status of the South Postal Annex at the time was still unresolved; and that comparison has yet to be made.

In retrospect, it would clearly have been timely and relevant for all of us to have known in 2003 what we now know - i.e., the \$2B cost of surface track expansion at South Station. Had we had that information then, there would likely have been a very different conclusion about the relative merits of the NSRL as compared to SSX -- not to mention its NSX counterpart.

In any case, we should not repeat that mistake; and there is really no reason to do so since MassDOT has now commissioned a new NSRL Feasibility Study that is scheduled to get underway within a matter of days. If properly done, that study can provide the information needed to support a No-Build analysis for the SSX Project that would supplement what has already been done in the Draft EA. Before we commit \$2B to what may prove to be a relatively temporary and incomplete transportation solution, not to mention one with great opportunity costs from a development perspective, a thoughtful comparison of these two alternatives is the only prudent and responsible approach.

We are aware that some have suggested that the SSX/NSRL comparison need not be a priority because moving ahead with SSX now does not preclude moving ahead with the NSRL at some future date. We strongly disagree with that assumption on its merits and as a practical matter. If \$2B is spent to expand surface tracks at South Station, there will be neither the public capacity nor the popular appetite for another multi-billion-dollar project in the same vicinity, especially one that will effectively undo what its predecessor has just done.

Now is the time to compare these projects and only proceed with the one that will solve the problem most permanently and most cost-effectively. Now is the time to make a choice, and to make the right choice. We cannot have it both ways; and we should not think otherwise. Let's do it right the first time. To that end, we hereby recommend and request that a full DEIR/DEIS be done for the South Station Expansion project.

Sincerely,



Robert O'Brien, Chair (1995-2003)



John Businger, Vice-Chair (1995-2003)

NSRL Citizens Advisory Committee

cc: Governor Charlie Baker  
Secretary of Energy & Environmental Affairs Matthew Beaton  
Secretary of Transportation Stephanie Pollack  
NSRL Legislative Caucus Chair Sen. James Eldridge  
Boston Mayor Martin Walsh and Chief of Staff Daniel Koh  
Former Governors Michael S. Dukakis and William F. Weld  
Other Members of the NSRL Working Group



May 26, 2017

**OFFICERS**

George G. Schwartz  
CHAIRMAN

Douglas M. McGarrah, Esq.  
VICE CHAIR

Susan M. Wolkoff  
TREASURER

Edward H. Ladd  
CLERK

**EXECUTIVE COMMITTEE**

Zamawa Arenas  
Robert L. Beal\*  
Phillip J. Brannigan, Jr.  
Michael A. Cantalupa\*  
Joseph Carroll  
Andrew J. Dankwerth  
Lawrence S. DiCara, Esq.\*  
John E. Drew\*  
Ronald M. Druker  
Richard E. Fournier  
Thomas J. Hynes, Jr.  
Mark R. Johnson  
William F.X. Kene  
James G. Keefe  
Kevin M. Lemire  
Alan M. Leventhal  
Christopher W. Maher  
Paul R. Marcus  
Michael E. Mooney, Esq.\*  
Young K. Park  
David G. Perry  
E. Macey Russell  
Mark W. Smith  
James M. Tierney  
Dana E. Warren  
Karen L. Whiteknact

Richard A. Dimino  
PRESIDENT & CEO

\* Former Chairman

Mr. Stephen Woelfel  
South Station Expansion Project Manager  
Deputy Director, MassDOT Office of Transportation Planning  
10 Park Plaza, Suite 4150  
Boston, MA 02116  
[steve.woelfel@state.ma.us](mailto:steve.woelfel@state.ma.us)

Re: Comments on South Station Expansion Project Draft Environmental Assessment and Draft Section 4(f) Determination

Dear Mr. Woelfel:

On behalf of A Better City, I am pleased to submit the following comments on the report on the South Station Expansion Project dated March 2017 cited above. We believe that the South Station expansion is a critical component in the multi-modal transportation network of the state, the region, and the Northeast Corridor. Advancement of this project will provide significant benefits for the transportation, economic, and environmental health and vitality of the region.

A Better City is a business and institutional membership organization that advocates for sustainable transportation and development. We have been closely involved with many transportation projects related to South Station.

The viability of many other transportation projects planned for the region and the Northeast Corridor are dependent upon the creation of additional capacity for passengers at the South Station headhouse and for rail operations at the platforms, tracks and interlockings, and layover facilities. A Better City supports and advocates for implementation of the following improvements in order to realize the potential as expeditiously as possible:

- Acquire and demolish the USPS facility to provide about 14 acres of space to expand the terminal.
- Reopen Dorchester Avenue and extend the Harborwalk for public use and to reconnect Summer Street to South Boston along the Fort Point Channel.
- Expand the South Station terminal adding seven new tracks and four platforms; reconfiguring existing tracks and platforms; upgrading rail infrastructure; adding an expanded headhouse and a mid-platform elevated concourse.
- Construct new and expanded rail layover facilities.

These changes would not preclude future private transit-oriented development that would undergo a separate review and approval process.



Implementation of these improvements will result in the following transportation and other benefits that address the stated purpose and need for this project, including:

- Enabling growth in passenger rail transportation in Massachusetts and along the Northeast Corridor.
- Improving service reliability and layover capacity.
- Improving the passenger experience and capacity of South Station.
- Promoting and supporting city-building.
- Allowing Dorchester Avenue to be reopened for public use following relocation of the Postal Facility and its activities.

Expansion of South Station is necessary to accommodate the expected increase in transit demand and service need for Downtown Boston and the South Boston Waterfront area. Over the next two decades, an additional 17 million square feet of development is underway or planned in the South Boston Waterfront. As a result, by 2035 total person-trips in that area alone is projected to grow by 63 percent. There is a projected 64 percent increase for transit trips over current demand. The South Boston waterfront is one of the fastest growing job centers in Massachusetts, with demand for transportation services continuing to increase and place ever increasing strain on the capacity of South Station.

The addition of new tracks and platforms at South Station support the possibility of introducing new Urban Rail systems in the future, overlaid on the existing commuter rail infrastructure to support improved access for neighborhoods and communities inside of Route 128 that can benefit from faster and more frequent service using vehicles more suitable for shorter runs.

The South Station Expansion Project, if designed and constructed as described in this environmental document, will provide a number of environmental benefits, which include:

- **Transportation:** Improved capacity of rail operations and pedestrian passenger circulation as well as relieved congestion at the curbside that will enhance the efficiency of operations and the experience of passengers.
- **Land use:** Reallocating the Postal Service land to transportation use adjacent to the train station is an appropriate change that brings with it the added benefit of making Dorchester Avenue and the western edge of the Fort Point Channel accessible to the public.
- **Economic growth:** The enhanced transportation services associated with this project will support continued economic growth and development in the adjacent Financial District and South Boston Waterfront.
- **Design quality:** The planned headhouse expansion made possible by relocation of the Postal Facility respects the historic existing headhouse structure and provides another entrance on Dorchester Avenue that can spread the concentration of pedestrian arrivals and departures to the station and platforms.



- **Noise control:** Noise impacts at 245 Summer Street and in Readville can be reduced with noise barriers to help to contain the noise and separate the sources from sensitive receptors.
- **Open space:** Along Fort Point Channel and at Rolling Bridge Park open space and recreational opportunities can be enhanced.
- **Construction impacts** can be mitigated and temporary impacts on rail service, traffic, and pedestrian uses can be reduced. Techniques for control of construction noise, dust, and vibration are well developed and have been successfully employed in the neighborhood in the recent past.

The project has an overwhelmingly positive impact on its environment and for all of these reasons, A Better City wholeheartedly supports the advancement of the South Station Expansion Project and urges the Federal Railroad Administration to issue a positive Section 4(f) Determination and a Finding of No Significant Impact.

We hope that these comments will be helpful in advancing the design and implementation of this critically important project for our region.

Sincerely,



Richard A. Dimino  
President and CEO

6625/1 ssxtt7526



**SIERRA CLUB**  
MASSACHUSETTS

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

Mr. Stephen Woelfel

May 25, 2017

Page 2

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.<sup>1</sup>

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.<sup>2</sup> 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.

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

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

**SIERRA CLUB**  
MASSACHUSETTS

Hon. Charles D. Baker, Jr.  
May 27, 2016  
Page 2

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*<sup>3</sup> 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 189<sup>th</sup> General Court of the Commonwealth of Massachusetts (by email)

<sup>3</sup> <http://www.necfuture.com>



May 25, 017

VIA EMAIL AND U.S. CERTIFIED MAIL

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

Re: Comments on the South Station Expansion Project Draft Environmental  
Assessment and Draft Section 4(f) Determination

Dear Mr. Woelfel:

My name is Charles Moore and I am Senior Counsel for Americold Logistics, LLC the operator of the facility owned by ART Mortgage Borrower Propco, LLC (hereinafter collectively referred to as "Americold") located at 100 Widett Circle. I am writing on behalf of Americold to provide our comments regarding the South Station Expansion Project (the "Project") Draft Environmental Assessment and Draft Section 4(f) Determination (the "EA"). Americold's temperature-controlled storage facility is located in Widett Circle, the proposed location of the new rail layover facility. Construction of the Project as planned will require the direct displacement of the City of Boston's largest concentration of temperature-controlled food storage, distribution, processing, and logistics facilities.

We reviewed the EA and are concerned that it does not sufficiently analyze the potential impacts of the Project on the socioeconomic environment. Nor do we believe that the EA contains sufficient analysis of the proposed mitigation measures to support the conclusion that the proposed mitigation measures would reduce impacts to less-than-significant levels. A successful relocation of our facility presents serious practical and economic challenges. As a critical part of the food supply chain, this would include identifying and developing a sufficiently large facility in a location centrally-located between suppliers, customers, employees, and transportation infrastructure. However, the EA does not identify potential relocation sites. Potential relocation sites must be identified so that the various factors that comprise economic viability can be analyzed on a site-by-site basis.

Americold has been located in its current location in Widett Circle since 1969. Our 3 Million Cubic-Foot facility provides temperature-controlled storage for a variety of foodstuffs, including seafood, meat, cranberries, blueberries, and dry goods. We have a total of fifteen employees, the majority of whom are local residents. Americold, as well as the other food processing, storage, and logistics facilities in Widett Circle, are an essential component of the regional economy. As a group, we employ a large number of Boston's residents and indirectly support thousands of regional jobs -- including, among others, commercial fishing and farming, commercial transport, and restaurant and food service employees. Our central location -- in close proximity to employees, suppliers, and customers -- has enabled us to become a critical element of the region's vibrant restaurant, food service, food processing, and food logistics industries.



The Project includes the construction of rail layover facilities at Widett Circle, that will require the “direct business displacements” of the nearly thirty businesses located in Widett Circle. In order to assess the impact of a proposed action on the socioeconomic environment of the affected area, the Federal Railroad Administration’s (the “FRA”) Procedures for Considering Environmental Impacts (64 Federal Register 28545 [May 26, 1999]) requires consideration of: (1) the numbers and kinds of available jobs; (2) the potential for community disruption and demographic shifts; (3) the need for and availability of relocation housing; (4) impacts on commerce, including existing business districts, metropolitan areas, and the immediate area of the alternative; and, (5) impacts on local government services and revenues.

It does not appear that the EA sufficiently analyzes any of these criteria, specifically in the context of the businesses that will be displaced from Widett Circle. Section 3.13 of the EA includes a discussion of the Boston region’s recent economic and population trends, as well as reference to population trends within one-half mile of Widett Circle. An economic study referencing potential impact to the greater Boston MPO region is also referenced. However there is no discussion or analysis of the number and types of jobs provided by the nearly thirty businesses in Widett Circle, nor of the potential community disruption that will be caused by their relocation to an undetermined location. In light of the critical role we play in the local, city and regional economies – particularly in the restaurant, food service, food processing, and food logistics industries – our relocation will have significant disrupting impacts not only on South Boston, but on the City of Boston’s and the region’s overall commerce and sources of government revenue. To properly assess the impact to the socioeconomic environment, the FRA’s regulations require that these potential impacts – including direct, indirect, and cumulative – be sufficiently analyzed and discussed.

In order to mitigate the significant impact of “direct business displacements,” the EA includes what appears to be a two-pronged mitigation measure: 1) relocation assistance and compensation provided by the Massachusetts Department of Transportation, in accordance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970; and, 2) anticipation that suitable relocation sites are available in industrial sites in the immediate South Boston area. No specific relocation sites are identified in the EA, however. Such information is essential to evaluating the viability of relocation as a mitigation measure. Widett Circle’s location is a critical element of our economic viability. Our strategic location in Widett Circle is close to employees, suppliers, and customers, as well as major transportation thoroughfares. Relocating our existing operations would be very difficult. In order to facilitate a relocation of our business, MassDOT would have to identify a sufficiently large facility (at least 3 Million Cubic Feet), proximately located to employees, suppliers, customers, and infrastructure. This indeed is a herculean task that is not taken up or addressed by the EA. Potential relocation locations must be identified so that the various factors that comprise economic viability can be analyzed on a site-by-site basis.



We appreciate the need for updating and upgrading our city and region's rail transportation network. We ask, however, that the potential impacts of the Project on the socioeconomic environment, as well as proposed mitigation measures, be sufficiently analyzed, as required by FRA regulations.

Thank you.

Sincerely,



Charlie Moore  
Senior Counsel

cc: Ms. Amishi Castelli, Ph.D, Federal Railway Administration ([amishi.castelli@dot.gov](mailto:amishi.castelli@dot.gov))  
John J. Griffin, Esq.  
John V. Chibbaro, Esq.

## Nancy Farrell

---

**From:** Woelfel, Steve (DOT) <steve.woelfel@state.ma.us>  
**Sent:** Friday, May 26, 2017 2:03 PM  
**To:** Nancy Farrell; Regan Checchio  
**Cc:** Paul Godfrey  
**Subject:** FW: South Station Expansion Project

---

**From:** John E. Drew [mailto:John.Drew@drewcompany.com]  
**Sent:** Friday, May 26, 2017 1:25 PM  
**To:** Woelfel, Steve (DOT)  
**Cc:** tryan@abettercity.org; John E. Drew  
**Subject:** South Station Expansion Project

Friday, May 26, 2017

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

Dear Mr. Woelfel,

As an Executive Committee member of A Better City and a long time business owner located in the South Boston Waterfront, I am writing to support the expansion of South Station.

- South Station expansion is a critical component in the multi-modal transportation network of the state, the region, and the Northeast Corridor. Advancement of this project will provide significant benefits for the transportation, economic, and environmental health and vitality of the region.
- The viability of many other transportation projects planned for the region and the Northeast Corridor are dependent upon the creation of additional capacity for passengers at South Station
- South Station Expansion is necessary to accommodate the expected increase in transit demand and service needed for the South Boston Waterfront area as well as Boston's central business district.
- The South Boston Waterfront Sustainable Transportation Plan supported South Station Expansion as a key component for providing high quality transit access and improved pedestrian and bicycle access to the Waterfront.
- Over the next two decades, another 17 million square feet of development is underway or planned. As a result, the report expects that by 2035, total person-trips within the Waterfront are projected to grow by 63 percent. Also, there is a projected 64 percent increase for transit trips over today's demand, all while the Silver Line is currently operating at 123% of its own capacity during the

peak hours. This area is one of the fastest growing job centers in Massachusetts and the demand for transportation services to this area will continue to increase.

- One significant benefit currently anticipated in the South Station Expansion project is the reopening of Dorchester Avenue to improve pedestrian, bicycle, and vehicle movement in the area. Reopening Dorchester Avenue and adding to the Harborwalk will complete the last remaining gap in a continuous waterfront walkway in this part of downtown Boston and provide linkages to the South Boston Waterfront from adjacent neighborhoods, in addition to the potential for public-private development opportunities along this corridor.

I hope that these comments of support will be helpful in implementing this critical project for our region.

Sincerely,



John E. Drew  
Chairman  
Drew Company  
2 Seaport Lane 9<sup>th</sup> Fl  
Boston, MA 02210  
Tel: (617) 385-5060

**MASSACHUSETTS  
CONVENTION CENTER  
AUTHORITY**

May 26, 2017

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

Re: South Station Expansion Project Draft Environmental Assessment

Dear Mr. Woelfel:

The Massachusetts Convention Center Authority ("MCCA") submits the following relative to the proposed South Station Expansion Project Draft Environmental Assessment. The additional capacity that will be realized by the expansion of South Station is both key to the Commonwealth's efforts to expand its multimodal transportation network, while enhancing the capacity and viability of the Northeast Corridor.

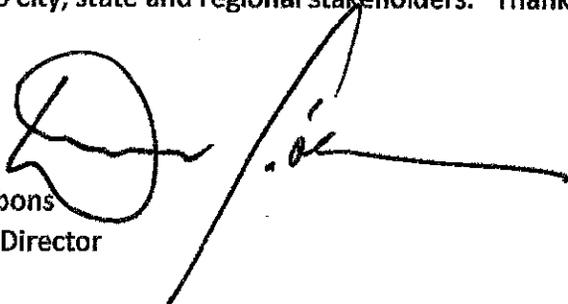
The Boston Convention & Exhibition Center ("BCEC") relies on South Station as a key component of our transportation portfolio for our clients and attendees. The proposed improvements to South Station are certain to have a meaningful and measurable impact on our ability to serve our customers both now and as we prepare for continued growth in the future.

The MCCA is part of a collaborative effort which recently released the South Boston Waterfront Sustainable Transportation Plan ("SBWSTP") to address the many challenges and specific needs of affected stakeholders who seek sensible, achievable and actionable opportunities to better manage the significant transportation challenges in the South Boston Waterfront. The SBWSTP is being managed by A Better City and includes not only the MCCA but MassDOT, the City of Boston, and the Boston Planning & Development Agency.

The findings of the SBWSTP report supported the South Station Expansion project in order to provide additional high quality transit access and improved pedestrian and bicycle access to the BCEC and South Boston Waterfront. The South Station Expansion Project is necessary to accommodate the expected increase in overall transit demand in the South Boston Waterfront as well as Boston's central business district.

The South Station Expansion Project will deliver considerable transit, mobility, environmental, and economic development benefits and the City of Boston, the Commonwealth and the region will be better served when this project is completed. The MCCA requests that the Federal Railroad Commission issue a positive recommendation for a project that will deliver a myriad of benefits to city, state and regional stakeholders. Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in black ink, appearing to read 'David Gibbons', written over a horizontal line. The signature is stylized with a large loop at the beginning and a long horizontal stroke at the end.

David Gibbons  
Executive Director



Massachusetts Port Authority  
One Harborside Drive, Suite 200S  
East Boston, MA 02128-2909  
Telephone (617) 568-5000  
www.massport.com

May 26, 2017

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

**Re: South Station Expansion Project/Draft Environmental Assessment and Draft Section 4(f) Determination**

Dear Mr. Woelfel:

On behalf of the Massachusetts Port Authority (Massport), thank you for the opportunity to review and comment on the Draft Environmental Assessment and Draft Section 4(f) Determination for the South Station Expansion Project. Massport supports the expansion of South Station and the transit improvements that would enable the much-needed growth in passenger rail along the Northeast Corridor (NEC) and within the Commonwealth of Massachusetts. The project would also facilitate improvements in corridor and regional mobility, passenger experience and comfort, economic development, and quality of life. The inclusion of the multi-modal transportation and urban design elements of the project will help redefine the area and the connections to the rest of the City.

We offer the following comments:

- **Transit Connections:** In enhancing capacity for commuter rail service and operations, the project design anticipates the possible implementation of new or emerging transit service concepts that may directly use the rail lines that serve South Station and provide much needed access to the larger region. The project design should ensure that connections to the Silver Line Transitway and Logan Airport are maintained and improved wherever possible.
- **Layover Facility:** The Draft EA describes plans for a rail layover facility at Widett Circle as well as an expansion of the existing Readville – Yard 2 layout facility. Massport requests that plans for Widett Circle be designed to maintain full capacity of the South Boston Bypass Road (which is incorrectly labelled as the "Massport Haul Road" on many of the plans included) in order to preserve critical freight access to and from the South Boston Waterfront.
- **Building Heights:** The current project no longer includes a future private joint development component but does include expansion of the South Station Headhouse that will be no more than 80 feet tall. In coordination with Massport, the Federal Aviation Administration (FAA), Massport has prepared and widely circulated the Logan Airspace Composite Map that defines the critical airspace around Boston Logan International Airport to protect the flight corridors in and out of the Airport. Created by Massport, with input from airlines, pilots, city officials, and the FAA, the Composite Map helps guide developers and regulatory authorities to safely build without compromising air travel safety. The map aids developers in their planning and assists the FAA in its review of individual projects to determine if they present a potential hazard to air navigation. Based on our review of the preliminary project plans, it appears that the Project is consistent with the aforementioned airspace map. Massport encourages the Proponent to coordinate closely with Massport during the remainder of the design process and early in the construction phase, which is particularly important to minimize the extent and duration of impacts of the demolition crane(s) on the airspace. The Proponent will be required to submit multiple Form 7460s to the FAA, one for the building and a separate filing for construction cranes.

- **Harborwalk/Public Access:** The reopening of Dorchester Avenue and the extension of the public Harborwalk along the eastern part of the site will create a valuable additional north-south roadway connection, enhance public access to the Fort Point Channel waterfront, and improve the streetscape along Dorchester Avenue and Summer Street. This urban design element will be a benefit to the public and City of Boston and is consistent with the South Boston Transportation Plan recommendation to reopen Dorchester Avenue to all modes.
- **Seaport Transportation and Truck Routes:** The major arterials in South Boston, Summer Street and Seaport Boulevard, in particular, are critical truck routes serving the Port of Boston, including South Boston facilities such as the Boston Fish Pier, the Raymond Flynn Marine Park, and Conley Terminal, as well as other industrial and commercial businesses in the area. Therefore, Massport would remind all agencies that continued truck access and operational efficiencies in the South Boston Waterfront should be a priority.

We look forward to a continuing engagement on the South Station Expansion as the project proceeds.

Sincerely,

**Massachusetts Port Authority**

A handwritten signature in black ink, appearing to read "Stewart Dalzell", written in a cursive style.

Stewart Dalzell, Deputy Director  
Environmental Planning & Permitting

Cc: G. Carr, J. Doolin, A. Hargens, H. Morrison, L. Gilmore, M. Gove, F. Leo/Massport



# MASSACHUSETTS WATER RESOURCES AUTHORITY

Charlestown Navy Yard  
100 First Avenue, Building 39  
Boston, MA 02129

Frederick A. Laskey  
Executive Director

May 26, 2017

Telephone: (617) 242-6000  
Fax: (617) 788-4899  
TTY: (617) 788-4971

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

Subject: EOEEA #15028 - Draft Environmental Assessment and  
Draft Section 4 (f) Determination  
South Station Expansion Project, Boston, MA

Dear Mr. Woelfel:

The Massachusetts Water Resources Authority (MWRA) appreciates the opportunity to comment on the Draft Environmental Assessment (EA) and Draft Section 4(f) Determination submitted by the Federal Railroad Administration (FRA) and the Massachusetts Department of Transportation (MassDOT) (the "Proponents") for the South Station Expansion (SSX) Project pursuant to the National Environmental Policy Act (NEPA). The purpose of the SSX project is to expand the station terminal capacity and related layover capacity in order to meet current and future high-speed, intercity and commuter rail service needs. The SSX Project would also promote city-building in a key area of Boston, and allow Dorchester Avenue to be reopened for public use and enjoyment for the first time in decades.

MWRA offers the following comments consistent with those submitted to the State Massachusetts Environmental Policy Act (MEPA) Unit on the Final Environmental Impact Report date August 5, 2016 (see attached). The (MEPA) environmental review process for the SSX Project concluded with the issuance of a final Certificate on August 12, 2016, on the Final Environmental Impact Report (FEIR).

MWRA's comments continue to focus on issues related to wastewater flows and the need to attain required long-term levels of combined sewer overflow (CSO) control in the Fort Point Channel, discharge permitting within the MWRA's Toxic Reduction and Control (TRAC) Department and 8 (m) permitting from the Wastewater Operations Department.

## Wastewater Flows

The Draft EA reports that the Build Alternative at South Station would decrease the amount of impervious land cover at the site due to the removal of the existing United States Postal Service (USPS) facility and its replacement with an expanded railroad yard, as well as the addition of landscaped areas on Dorchester Avenue. In addition, MassDOT proposes to include a level of recharge of stormwater through the installation of Best Management Practices (BMP), including

a bioretention area in the vicinity of South Station. From this information, MWRA understands that MassDOT expects that these stormwater controls will reduce stormwater pollution loadings to the Fort Point Channel and can decrease the amount of stormwater that currently enters existing combined sewer overflow (CSO) outfalls along Fort Point Channel and Boston Inner Harbor. MWRA sees the reduction of separate stormwater flows to the CSO outfalls as potentially reducing hydraulic burden and dedicating more of the hydraulic capacity of each outfall to the necessary disposal of CSO.

The Draft EA reports that the SSX Project will increase wastewater flow by 144,780 gallons per day (gpd), from current 354,090 gpd to 498,870 gpd. To mitigate potential wastewater system and CSO impacts due to the increased wastewater flow, MassDOT commits in the Draft EA to developing an infiltration/inflow (I/I) reduction plan as the project design advances and in consultation with Mass Department of Environmental Protection (DEP) and the Boston Water & Sewer Commission (BWSC). In the FEIR submitted to the MEPA office, MassDOT stated that BWS had indicated there likely is not adequate existing piping in the immediate vicinity of the project site in which the I/I work could be performed to meet the necessary level of offset. Sewer systems in other areas that are hydraulically connected to the mains in the vicinity of the South Station site potentially could be used to meet I/I sewer system rehabilitation requirements. The FEIR also pointed out that I/I reduction opportunities may exist in other areas of Boston, but MWRA is concerned that I/I reduction opportunities remote from the SSX project may not contribute to achieving the necessary level of wastewater offset.

MWRA is pleased that MassDOT recognizes the importance of I/I removal to avoid worsening CSO discharges and potentially compromising compliance with federal court ordered levels of CSO control. MWRA asks that MassDOT demonstrate with its I/I plan an assurance that CSO impacts from the new wastewater flows are fully mitigated at the several Fort Point Channel and Boston Inner Harbor CSO outfalls hydraulically associated with the BWSC sewer system serving South Station.

In its FEIR, MassDOT also stated that it will confirm existing outfall discharges through data collection and or field inspection and, "once the existing wastewater system is fully modeled," will develop a plan to mitigate the impacts from the proposed facility expansion. MWRA requested receiving from MassDOT a copy of the data it collects on the existing sewer system performance and any sewer system model results of existing and proposed (Build) conditions.

#### TRAC Discharge Permitting

Once the SSX Project is completed, and if the Proponent(s) intends to discharge wastewater from a vehicle wash and/or maintenance operation to the MWRA sanitary sewer system, a Sewer Use Discharge Permit will be required. For assistance in obtaining this permit, the Proponent should contact George Riley, Industrial Coordinator in the TRAC Group at (617) 305-5664. The SSX Project is required to have this Permit prior to discharging any wastewater from a vehicle wash process into the sewer system.

In the event tunnels will be constructed as part of the SSX Project, pursuant to 360 C.M.R. 10.023(1), the discharge of seepage or continuous groundwater discharge into the MWRA sanitary sewer system is prohibited. The MWRA cannot allow the discharge of post-construction groundwater seepage into the sanitary sewer system.

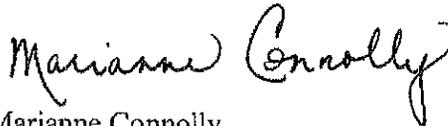
MassDOT must also comply with 360 C.M.R. 10.016, if it intends to install gas/oil separator(s) in any of its bus and/or rail facilities to support shops, vehicle storage buildings, and/or in the vehicle wash building planned for the site. In addition to complying with 360 C.M.R. 10.000, MassDOT will need to conform to the regulations of the Board of State Examiners of Plumbers and Gas Fitters, 248 C.M.R. 2.00 (State Plumbing Code), and all other applicable laws. The installation of proposed gas/oil separator(s) will require MWRA approval and may not be back filled until inspected and approved by the MWRA and the Local Plumbing Inspector. For assistance in obtaining an inspection for each facility MassDOT should contact Mr. Stephen Howard, Source Coordinator, within the TRAC Department at (617) 305-5675.

#### Section 8 (m) Permitting

Section 8 (m) of Chapter 372 of the Acts of 1984, MWRA's Enabling Legislation, enables the MWRA to issue permits to build, construct, excavate, or cross within or near an easement or other property interest held by the MWRA, with the goal of protecting Authority-owned infrastructure. MWRA owns and maintains large water and wastewater infrastructure within the project area/s. The Proponent's Consultants have been working with staff from both MWRA's Water and Wastewater Permitting Groups to ensure that MWRA infrastructure (City Tunnel, Water Main Sections 9, 2 and 3 and Sewer lines Section 1, 162 and 162A) in the vicinity of the Beacon Park Yard Layover Facility is protected. The Proponent is aware that blasting and drilling in the vicinity of the Beacon Park Yard which sits over the City Tunnel is prohibited.

MWRA expects to continue to work closely with the Proponents and their Consultants to identify where 8 (m) permits will be required. Should you have any questions or require further information on these comments, please contact me at (617) 788-1165.

Very truly yours,



Marianne Connolly  
Sr. Program Manager  
Environmental Review and Compliance

cc: David Kubiak, MWRA Engineering & Construction  
Kattia Thomas, TRAC  
Kevin McKenna, MWRA Wastewater Operations Permitting  
Ralph Francesconi, MWRA Water Operations Permitting  
Adam Horst, Boston Water & Sewer Commission  
Kevin Brander, DEP

C: NEPASouthStationExpansionBoston.docx



# MASSACHUSETTS WATER RESOURCES AUTHORITY

Charlestown Navy Yard  
100 First Avenue, Building 39  
Boston, MA 02129

Frederick A. Laskey  
Executive Director

August 5, 2016

Telephone: (617) 242-6000  
Fax: (617) 788-4899  
TTY: (617) 788-4971

Matthew A. Beaton, Secretary  
Executive Office of Energy and Environmental Affairs  
100 Cambridge St, Suite 900  
Attn: MEPA Office, Holly Johnson  
Boston, MA 02114

Subject: EOEEA #15028 – Final Environmental Impact Report,  
South Station Expansion Project, Boston, MA

Dear Secretary Beaton:

The Massachusetts Water Resources Authority (MWRA) appreciates the opportunity to comment on the Final Environmental Impact Report (FEIR) for the proposed South Station Expansion (SSX) Project (Project) submitted by the Massachusetts Department of Transportation (MassDOT). The MassDOT proposes the South Station Expansion (SSX) project that includes the expansion of the South Station terminal facilities, acquisitions and demolition of the US Postal Service and distribution facility located adjacent to South Station on Dorchester Avenue; extension of the Boston Harborwalk along a pre-opened Dorchester Avenue; provision for the opportunity for future public/private developments adjacent and to expanded South Station; and provisions for adequate rail vehicle layover for both intercity and commuter rail services. The South Station project site occupies approximately 49 acres near Chinatown, the Fort Point Channel, and the Seaport-Innovation District/South Boston Waterfront. The primary purpose for the SSX project is to improve the Amtrak's Northeast Corridor (NEC) passenger rail service delivery into and out of Boston so as to accommodate the existing services and enable projected growth in high-speed rail (HSR) service and other intercity passenger rail service throughout the Northeast. A horizon year of 2035 and an approximate opening year of 2025 are used for analysis of the project.

MWRA's comments continue to focus on issues related to wastewater flows and the need to attain required long-term levels of combined sewer overflow (CSO) control in the Fort Point Channel, discharge permitting within the Toxic Reduction and Control (TRAC) Department and 8 (m) permitting from the Wastewater Operations Department.

## Wastewater

Table 3-4 of the FEIR updates the Project's estimated water use and wastewater generation, and the increases to water use and wastewater generation over existing levels. The Project is estimated to increase wastewater generation by 150,560 gallons per day (gpd), a 44% increase in flow. MWRA's December 23, 2014, comment letter on the SSX Draft Environmental Impact Report (DEIR), stated that new wastewater flows must be offset in accordance with Massachusetts Department of Environmental Protection (MassDEP) regulations to avoid causing greater surcharging within the Boston Water and Sewer Commission (BWSC)

and MWRA combined sewer and regional collection systems in large storms and possibly worsening combined sewer overflow discharges to the Fort Point Channel and Boston Harbor.

In response, the FEIR states that MassDOT will develop an I/I plan to mitigate for increased flows at the South Station site as the project design advances and in consultation with MassDEP and BWSC. The FEIR also states that BWSC has indicated there likely is not adequate existing piping in the immediate vicinity of the project site with which the I/I requirements could be met. Sewer systems in other areas that are hydraulically connected to the mains in the vicinity of the South Station site potentially could be used to meet I/I sewer system rehabilitation requirements. The FEIR also points out that I/I reduction opportunities may exist in other areas of Boston.

MWRA is pleased that MassDOT recognizes the importance of I/I removal to avoid worsening CSO discharges and potentially compromising compliance with Federal Court ordered levels of CSO control. MWRA asks that MassDOT demonstrate with its I/I plan an assurance that CSO impacts from the new wastewater flows are avoided or fully mitigated at the several CSO outfalls associated with the BWSC sewer system serving South Station that can discharge to the Fort Point Channel and, further north, to Boston Harbor along the downtown waterfront. The affected BWSC outfalls may include BOS057 and BOS060 along the downtown Waterfront, as well as the several CSO outfalls that discharge to Fort Point Channel.

MWRA's comment letter on the DEIR also stated that the Proponent should evaluate, in the FEIR, how the local sewers to which the project's flows will be connected will perform with the large added flows from the project and the I/I reduction that may occur far afield. The FEIR describes the BWSC sewer system serving the Project site and the potentially affected combined sewer outfalls in the Project area. The FEIR also states that MassDOT will confirm existing outfall discharges through data collection and or field inspection and, "once the existing wastewater system is fully modeled," will develop a plan to mitigate the impacts from the proposed facility expansion. MWRA requests receiving from MassDOT a copy of the data it collects on the existing sewer system performance and any sewer system model results of existing and proposed conditions.

#### TRAC Discharge Permitting

MWRA prohibits the discharge of groundwater to the sanitary sewer system, pursuant to 360 C.M.R. 10.023(1) except in a combined sewer area when permitted by the Authority and the Boston Water Sewer Commission (BWSC). The proposed Project will have access to a storm drain and it is not located in a combined sewer area; therefore, the discharge of groundwater to the sanitary sewer system is prohibited. The Proponent will need to secure a USEPA-NPDES General Permit for Storm Water Discharges from its construction activities.

If tunnels are to be constructed as part of the South Station Expansion Project, the discharge of seepage or continuous groundwater discharge into the MWRA sanitary sewer system is prohibited. The MWRA will not allow the discharge of post-construction groundwater seepage into the sanitary sewer system, pursuant 360 C.M.R. 10.023(1).

Once the Project is completed, and if the Proponent(s) intend to discharge wastewater from a vehicle wash and/or maintenance operation to the sanitary sewer system, they must apply

for an MWRA Sewer Use Discharge Permit. For assistance in obtaining this permit, the Proponent should contact George Riley, Industrial Coordinator in the TRAC Department at (617) 305-5664. The Proponent is required to have this Discharge Permit prior to discharging wastewater from the vehicle wash process into the MWRA sanitary sewer system.

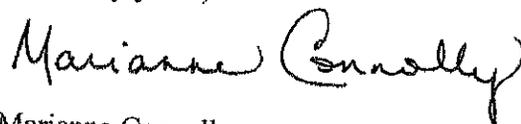
The Proponent(s) must also comply with 360 C.M.R. 10.016, if they intends to install gas/oil separator(s) in any of the bus and/or rail facilities to support shops, vehicle storage buildings, and/or in the vehicle wash building planned for the site. In addition to complying with 360 C.M.R. 10.000, the proponent(s) will need to conform to the regulations of the Board of State Examiners of Plumbers and Gas Fitters, 248 C.M.R. 2.00 (State Plumbing Code), and all other applicable laws. The installation of proposed gas/oil separator(s) will require MWRA approval and may not be back filled until inspected and approved by the MWRA and the Local Plumbing Inspector. To obtain an inspection for each facility the proponent(s) of each facility should contact Stephen Howard, Source Coordinator in the TRAC Department at (617) 305-5675.

#### Section 8 (m) Permitting

Section 8 (m) of Chapter 372 of the Acts of 1984, MWRA's Enabling Legislation, enables the MWRA to issue permits to build, construct, excavate, or cross within or near an easement or other property interest held by the MWRA, with the goal of protecting Authority-owned infrastructure. MWRA owns and maintains large water and wastewater infrastructure within the project area/s. The Proponent's consultants have been working with staff from both MWRA's Water and Wastewater Permitting Groups to ensure that MWRA infrastructure (City Tunnel, Water Main Sections 9, 2 and 3 and Sewer lines Section 1, 162 and 162A) in the vicinity of the Beacon Park Yard Layover Facility is protected. The Proponent is aware that blasting and drilling in the vicinity of the Beacon Park Yard which sits over the City Tunnel is prohibited.

MWRA expects to continue to work closely with the Proponent and their consultants to identify where 8 (m) permits will be required. Should you have any questions or require further information on these comments, please contact me at (617) 788-1165.

Very truly yours,



Marianne Connolly  
Sr. Program Manager  
Environmental Review and Compliance

cc: David Kubiak, MWRA Engineering & Construction  
Kattia Thomas, TRAC  
Kevin McKenna, MWRA Wastewater Operations Permitting  
Ralph Francesconi, MWRA Water Operations Permitting

C:\MEPA\15028SouthStationExpansionBostonFEIR.docx



# MASSACHUSETTS WATER RESOURCES AUTHORITY

Charlestown Navy Yard  
100 First Avenue, Building 39  
Boston, MA 02129

Frederick A. Laskey  
Executive Director

August 5, 2016

Telephone: (617) 242-6000  
Fax: (617) 788-4899  
TTY: (617) 788-4971

Matthew A. Beaton, Secretary  
Executive Office of Energy and Environmental Affairs  
100 Cambridge St, Suite 900  
Attn: MEPA Office, Holly Johnson  
Boston, MA 02114

Subject: EOEEA #15028 – Final Environmental Impact Report,  
South Station Expansion Project, Boston, MA

Dear Secretary Beaton:

The Massachusetts Water Resources Authority (MWRA) appreciates the opportunity to comment on the Final Environmental Impact Report (FEIR) for the proposed South Station Expansion (SSX) Project (Project) submitted by the Massachusetts Department of Transportation (MassDOT). The MassDOT proposes the South Station Expansion (SSX) project that includes the expansion of the South Station terminal facilities, acquisitions and demolition of the US Postal Service and distribution facility located adjacent to South Station on Dorchester Avenue; extension of the Boston Harborwalk along a pre-opened Dorchester Avenue; provision for the opportunity for future public/private developments adjacent and to expanded South Station; and provisions for adequate rail vehicle layover for both intercity and commuter rail services. The South Station project site occupies approximately 49 acres near Chinatown, the Fort Point Channel, and the Seaport-Innovation District/South Boston Waterfront. The primary purpose for the SSX project is to improve the Amtrak's Northeast Corridor (NEC) passenger rail service delivery into and out of Boston so as to accommodate the existing services and enable projected growth in high-speed rail (HSR) service and other intercity passenger rail service throughout the Northeast. A horizon year of 2035 and an approximate opening year of 2025 are used for analysis of the project.

MWRA's comments continue to focus on issues related to wastewater flows and the need to attain required long-term levels of combined sewer overflow (CSO) control in the Fort Point Channel, discharge permitting within the Toxic Reduction and Control (TRAC) Department and 8 (m) permitting from the Wastewater Operations Department.

## Wastewater

Table 3-4 of the FEIR updates the Project's estimated water use and wastewater generation, and the increases to water use and wastewater generation over existing levels. The Project is estimated to increase wastewater generation by 150,560 gallons per day (gpd), a 44% increase in flow. MWRA's December 23, 2014, comment letter on the SSX Draft Environmental Impact Report (DEIR), stated that new wastewater flows must be offset in accordance with Massachusetts Department of Environmental Protection (MassDEP) regulations to avoid causing greater surcharging within the Boston Water and Sewer Commission (BWSC)

and MWRA combined sewer and regional collection systems in large storms and possibly worsening combined sewer overflow discharges to the Fort Point Channel and Boston Harbor. In response, the FEIR states that MassDOT will develop an I/I plan to mitigate for increased flows at the South Station site as the project design advances and in consultation with MassDEP and BWSC. The FEIR also states that BWSC has indicated there likely is not adequate existing piping in the immediate vicinity of the project site with which the I/I requirements could be met. Sewer systems in other areas that are hydraulically connected to the mains in the vicinity of the South Station site potentially could be used to meet I/I sewer system rehabilitation requirements. The FEIR also points out that I/I reduction opportunities may exist in other areas of Boston.

MWRA is pleased that MassDOT recognizes the importance of I/I removal to avoid worsening CSO discharges and potentially compromising compliance with Federal Court ordered levels of CSO control. MWRA asks that MassDOT demonstrate with its I/I plan an assurance that CSO impacts from the new wastewater flows are avoided or fully mitigated at the several CSO outfalls associated with the BWSC sewer system serving South Station that can discharge to the Fort Point Channel and, further north, to Boston Harbor along the downtown waterfront. The affected BWSC outfalls may include BOS057 and BOS060 along the downtown Waterfront, as well as the several CSO outfalls that discharge to Fort Point Channel.

MWRA's comment letter on the DEIR also stated that the Proponent should evaluate, in the FEIR, how the local sewers to which the project's flows will be connected will perform with the large added flows from the project and the I/I reduction that may occur far afield. The FEIR describes the BWSC sewer system serving the Project site and the potentially affected combined sewer outfalls in the Project area. The FEIR also states that MassDOT will confirm existing outfall discharges through data collection and or field inspection and, "once the existing wastewater system is fully modeled," will develop a plan to mitigate the impacts from the proposed facility expansion. MWRA requests receiving from MassDOT a copy of the data it collects on the existing sewer system performance and any sewer system model results of existing and proposed conditions.

#### TRAC Discharge Permitting

MWRA prohibits the discharge of groundwater to the sanitary sewer system, pursuant to 360 C.M.R. 10.023(1) except in a combined sewer area when permitted by the Authority and the Boston Water Sewer Commission (BWSC). The proposed Project will have access to a storm drain and it is not located in a combined sewer area; therefore, the discharge of groundwater to the sanitary sewer system is prohibited. The Proponent will need to secure a USEPA-NPDES General Permit for Storm Water Discharges from its construction activities.

If tunnels are to be constructed as part of the South Station Expansion Project, the discharge of seepage or continuous groundwater discharge into the MWRA sanitary sewer system is prohibited. The MWRA will not allow the discharge of post-construction groundwater seepage into the sanitary sewer system, pursuant 360 C.M.R. 10.023(1).

Once the Project is completed, and if the Proponent(s) intend to discharge wastewater from a vehicle wash and/or maintenance operation to the sanitary sewer system, they must apply

for an MWRA Sewer Use Discharge Permit. For assistance in obtaining this permit, the Proponent should contact George Riley, Industrial Coordinator in the TRAC Department at (617) 305-5664. The Proponent is required to have this Discharge Permit prior to discharging wastewater from the vehicle wash process into the MWRA sanitary sewer system.

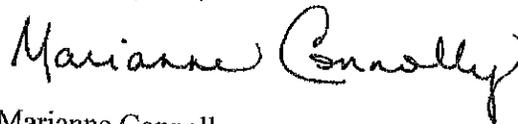
The Proponent(s) must also comply with 360 C.M.R. 10.016, if they intends to install gas/oil separator(s) in any of the bus and/or rail facilities to support shops, vehicle storage buildings, and/or in the vehicle wash building planned for the site. In addition to complying with 360 C.M.R. 10.000, the proponent(s) will need to conform to the regulations of the Board of State Examiners of Plumbers and Gas Fitters, 248 C.M.R. 2.00 (State Plumbing Code), and all other applicable laws. The installation of proposed gas/oil separator(s) will require MWRA approval and may not be back filled until inspected and approved by the MWRA and the Local Plumbing Inspector. To obtain an inspection for each facility the proponent(s) of each facility should contact Stephen Howard, Source Coordinator in the TRAC Department at (617) 305-5675.

#### Section 8 (m) Permitting

Section 8 (m) of Chapter 372 of the Acts of 1984, MWRA's Enabling Legislation, enables the MWRA to issue permits to build, construct, excavate, or cross within or near an easement or other property interest held by the MWRA, with the goal of protecting Authority-owned infrastructure. MWRA owns and maintains large water and wastewater infrastructure within the project area/s. The Proponent's consultants have been working with staff from both MWRA's Water and Wastewater Permitting Groups to ensure that MWRA infrastructure (City Tunnel, Water Main Sections 9, 2 and 3 and Sewer lines Section 1, 162 and 162A) in the vicinity of the Beacon Park Yard Layover Facility is protected. The Proponent is aware that blasting and drilling in the vicinity of the Beacon Park Yard which sits over the City Tunnel is prohibited.

MWRA expects to continue to work closely with the Proponent and their consultants to identify where 8 (m) permits will be required. Should you have any questions or require further information on these comments, please contact me at (617) 788-1165.

Very truly yours,



Marianne Connolly  
Sr. Program Manager  
Environmental Review and Compliance

cc: David Kubiak, MWRA Engineering & Construction  
Kattia Thomas, TRAC  
Kevin McKenna, MWRA Wastewater Operations Permitting  
Ralph Francesconi, MWRA Water Operations Permitting

C:\MEPA\15028SouthStationExpansionBostonFEIR.docx

May 26, 2017

Stephen Woelfel, Deputy Director  
MassDOT Office of Transportation Planning  
Project Manager for the South Station Expansion Project  
State Transportation Building  
Ten Park Plaza  
Boston, MA 02116

RE: Draft Environmental Assessment (EA) for the South Station Expansion Project

Dear Director Woelfel,

This letter will supplement the letter that I will be co-signing from the NSRL Working Group which you will also be receiving in connection with the environmental review of the proposal for expanding South Station.

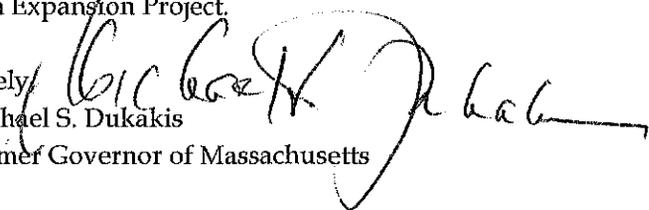
Federal statutes mandate that environmental review of major projects include the analysis of all reasonable alternatives. This is meant to assure that major investment decisions are made objectively, fairly and wisely; and it is most unfortunate that the Draft EA for SSX has systematically ignored and even dismissed its most obvious and compelling alternative - i.e., the unification of our regional rail system. More than an oversight, that is a fatal flaw in the EA process and the product that is now before us for review and comment. Before we commit \$2B to what may prove to be a relatively temporary and incomplete transportation solution, not to mention one with great opportunity costs from a development perspective, a thoughtful comparison of these two alternatives is the only prudent and responsible approach.

Some have suggested that the SSX/NSRL comparison need not be a priority because moving ahead with SSX now does not preclude moving ahead with the NSRL at some future date. But I strongly disagree with that assumption on its merits and as a practical matter. If \$2B is spent to expand surface tracks at South Station, there will be neither the public capacity nor the popular appetite for another multi-billion-dollar project in the same vicinity, especially one that will effectively undo what its predecessor has just done.

Now is the time to compare these projects and only proceed with the one that will solve the problem most permanently and most cost-effectively. Now is the time to make a choice, and to make the right choice. We cannot have it both ways; and we should not think otherwise. Let's do it right the first time.

To that end, I hereby recommend and request that a full DEIR/DEIS be done for the South Station Expansion Project.

Sincerely,  
s/ Michael S. Dukakis  
Former Governor of Massachusetts



# North South Rail Link Working Group

Michael Dukakis and William Weld, co-chairs

May 27, 2017

Mr. Stephen Woelfel  
South Station Expansion Project Manager  
10 Park Plaza, Suite 4150  
Boston MA 02116  
steve.woelfel@state.ma.us.

Re: South Station Expansion Project - Draft Federal Environmental Assessment

Dear Mr. Woelfel.

The North South Rail Link Working Group is a coalition of business, labor, environmental, civic and political leaders committed to efficient, effective and sustainable regional transportation for Massachusetts and New England. We believe that unifying and modernizing our antiquated and fragmented rail systems is critical to the continued growth of our economy, to expanding economic opportunity beyond the urban core, and to preserving and enhancing our environment and quality of life.

We have reviewed the Draft Environmental Assessment prepared for the South Station Expansion Project in Boston and respectfully submit the following comments.

While we commend Governor Baker and MassDOT for recognizing the need for expanded rail capacity to support South Coast Rail and other important initiatives, we believe that current plans to invest billions of dollars adding a handful of platforms to our obsolete downtown rail terminals represent a profound failure of vision, judgment and common sense, that not only fail to address our long-term system capacity needs, but actually compound the inherent inefficiency of these stub-end terminals, highlighted in the DEIR itself: *"As South Station is a terminal facility, every arriving train must reverse to leave the station as a new revenue trip or to access a layover facility. Every arriving trip is followed by a departing trip, further limiting station capacity."* This basic assessment should make clear that adding more platforms does not address the underlying issue, and may make it worse.

Even if the cost of these additional platforms were low, they would offer at best only short-term relief, and do nothing to address the structural inefficiencies that limit capacity and drive up operating costs, nor to remedy the larger disconnections that squander the potential value of our rail and transit systems. But at a cost of \$2 billion at South Station alone, and hundreds of millions more needed for additional tracks and bridges at North Station, this plan provides a shockingly poor return on investment and poses a major threat to alternative solutions with far greater and more durable environmental benefit. The capital cost of these projects is dwarfed by their opportunity cost, in potential connectivity, operating efficiency, and environmental benefits foreclosed.

Linking rather than expanding our terminals would provide far more long-term capacity, while vastly improving efficiency, connectivity, and land use in downtown Boston and beyond. This has been confirmed dozens of other cities, and was the subject of recent press coverage in the Wall Street Journal and Commonwealth Magazine just this week. Prior studies have demonstrated that unified rail service will improve the operating efficiency of the rail system and remove tens of thousands of cars from congested highways, reducing air pollution and climate impacts. It will encourage more sustainable transit-oriented development across the service area. On environmental grounds alone, permitting for SSX should not proceed until its environmental impacts have been thoroughly and carefully weighed against the North South Rail Link alternative, in the form of a full FEIS for both projects.

One of the arguments cited in support of SSX by project proponents and MassDOT itself, is that it will stimulate redevelopment of the key USPS property along Fort Point Channel. It has become increasingly clear however that encumbering the lower floors of any property with railroad tracks and related egress mezzanines will greatly increase the complexity and cost while slashing potential revenue - in short, that SSX is an obstacle to development not an incentive. Furthermore, as the MBTA itself reported in Jan. 2015, *"the cost of including joint development infrastructure (foundations, underground parking, access ramps, etc.) would leave little if any revenue from development to assist with the costs associated with the SSX project."*

The elimination of joint development from the currently recommended "build alternative" presumably reflects this economic reality. A few scattered references to potential development remain in the current Draft but, with no documentation, these cannot be taken seriously.

Worse still from a land-use standpoint, the expansion of stub-end terminals also requires the creation of new railroad layover yards on valuable nearby parcels with far higher potential uses. At Widett Circle in particular, 30 acres of prime land will be converted to railroad use, and an additional 100 acres of contiguous industrial area will be blighted in perpetuity. Boston has spent recent decades clawing back its 19<sup>th</sup> century urban rail yards for higher civic uses, in Back Bay, Harvard Square, and most recently in Allston. In the 2017, with the city growing as never before, we should not now be expanding them.

It is reasonable to expect that any major public investment will be accompanied by thorough and objective analysis of such impacts, and all reasonable alternatives that might address them and provide better long-term value. In fact, such analysis is one of the key purposes and core requirements of the Federal environmental review process (40 CFR Parts 1500-1508):

**§1502.14 Alternatives including the proposed action.**

*"This section is the heart of the environmental impact statement. Based on the information and analysis presented in the sections on the Affected Environment (§1502.15) and the Environmental Consequences (§1502.16.... agencies shall:*

*(a) Rigorously explore and objectively evaluate all reasonable alternatives....*

***(b) Devote substantial treatment to each alternative considered in detail including the proposed action so that reviewers may evaluate their comparative merits.***

***(c) Include reasonable alternatives not within the jurisdiction of the lead agency.***

Despite mounting evidence of many other cities, and extensive public comment over many years, the SSX environmental review process has systematically ignored the most reasonable and compelling alternative to South Station Expansion, namely rail unification via a North South Rail Link, and as a result it has failed to honor the letter and spirit of the law.

Make no mistake - the environmental implications of the transportation choices we face are enormous and long term. A unified regional rail system will reduce highway congestion and related air pollution, encourage transit oriented development, and foster greater economic opportunity in regions that have been denied it. Doubling down on stub-end terminals will point us squarely in the wrong direction.

With the stakes so high we simply cannot proceed on the basis of a blinkered review that ignores so many critical factors. According to 40 CRF the first purpose of an Environmental Assessment is to: *"provide sufficient evidence and analysis for determining whether to prepare an environmental impact statement or a finding of no significant impact"*. The current Draft Environmental Assessment clearly provides insufficient basis for such a determination.

The Working Group therefore respectfully requests that the Draft Environmental Assessment be revised to address all relevant alternatives to terminal expansion, thereby providing sufficient basis for determining whether a full FEIS is required, and further recommends that no further funds be expended on the South Station Expansion Project until such a comprehensive FEIS has been completed in conformance with the requirements of 40 CFR Parts 1500-1508 and other relevant statutes.

Sincerely,



Michael S. Dukakis

Co-chair of the North South Rail Link Working Group  
Distinguished Professor of Public Science, Northeastern University

cc: Governor Charlie Baker, Sec. Stephanie Pollack, Sec. Matthew Beaton

## Nancy Farrell

---

**From:** Woelfel, Steve (DOT) <steve.woelfel@state.ma.us>  
**Sent:** Tuesday, May 30, 2017 9:40 AM  
**To:** Nancy Farrell; Regan Checchio  
**Cc:** Paul Godfrey  
**Subject:** FW: SSX Cost estimate  
**Attachments:** SSX Cost Estimate (DEIR)-Oct 2014.pdf; SSX Cost Estimate-October 2014.png

---

**From:** brad bradbells [REDACTED]  
**Sent:** Saturday, May 27, 2017 10:16 AM  
**To:** Woelfel, Steve (DOT)  
**Subject:** SSX Cost estimate

Steve,

Thank you for your call on Thursday and sharing the updated cost estimate for SSX. According to the attached DEIR appendix, the 2014 estimate for TIO costs only, including acquisition of the USPS property, was \$1.43 billion.

If I understand correctly, the current estimate is **\$1.60 billion for construction + \$384 million for the USPS property = \$1.984 billion**. If I have misunderstood this, please let me know.

An increase of over \$500 million in less than 3 years (a 39% increase) is obviously very pertinent to our current public debate and I think should be released as part of the current review process. I would encourage your team to do this at the earliest opportunity.

Brad

---

**TABLE 3**  
**TIO Construction Costs**

<b>Type of Cost</b>	<b>Component</b>	<b>Construction Period</b>	<b>Cost (\$Million)</b>
Property Acquisition	USPS facility	2018	236.7
	Widett Circle	2020	52.0
Engineering and Design	Final design	2018	65.2
Right-of-Way	USPS demolition	2020	39.2
	Urban streetscape	2020–2023	13.1
	Roadway improvements	2020–2023	24.6
Transport Structures	Signal, track, and platforms	2018–2022	268.6
	Layover facility	2020–2023	159.6
Terminal	New concourse	2020–2023	460.1
	Foundations for overbuild	2020–2021	111.3
<b>Total</b>			<b>1,430.3</b>

Note: Costs are in 2014 dollars.

## Nancy Farrell

---

**From:** Woelfel, Steve (DOT) <steve.woelfel@state.ma.us>  
**Sent:** Tuesday, May 30, 2017 9:41 AM  
**To:** Nancy Farrell; Regan Checchio  
**Cc:** Paul Godfrey  
**Subject:** FW: South Station Expansion Comments

**From:** Brian Gregory [REDACTED]  
**Sent:** Saturday, May 27, 2017 11:31 PM  
**To:** Woelfel, Steve (DOT)  
**Subject:** South Station Expansion Comments

Dear Mr. Woelfel,

My name is Brian Gregory, and I am an architectural and urban designer living in [REDACTED]. I am writing in regards to the proposed South Station Expansion Project, to voice my concerns over the project, and suggest instead that the state fund the North-South Rail Link as a means to solving the increasing pressures on South Station's capacity.

While the expansion project is admirable in its goals, an increase in the stub-end operation currently being employed only serves to kick the metaphorical can down the road, as well as failing to address eventual capacity issues at North Station.

The project necessitates the taking of the Post Office buildings, and replacing the majority of their square footage with tracks, leaving only a minimal strip for development. A revitalized Dorchester Avenue would be much better served by buildings that can take full advantage of the depth of those parcels, without having their first 3 floors compromised by rail-related functions. Additionally, while I would hope the majority of persons and businesses in the potential new development along the Fort Point Channel would use public transit, it is doubtful all will. With tracks below the buildings, sub-surface parking becomes less realistic as an option, pushing the parking into the above-ground portions of the building and negatively affecting both the building's pro-forma as well as the vitality of the urban environment.

Additionally concerning are the large areas needed for the layover spaces, something that would be greatly reduced or eliminated by a solution such as the North-South Rail Link. Widet Circle is sited in both the Olympics Bid as well as Imagine Boston 2030 as one of the most important underdeveloped tracks of land with proximity to downtown. Using it for off-service rail storage robs the city of its next great neighborhood, thwarts the ability to stitch the South End and South Boston together, and is far from the highest and best use of the land. Unlocking it for development, rather than relegating it to storage, could easily pay for the difference in cost between the SSX and the NSRL.

On top of Widet Circle, the plans for Beacon Yards are severely compromised by the extensive need of layover space. I would call the current plan less "straightening the Pike" and merely "making it less of a bend." The full potential of that property, sandwiched between Harvard and BU, and part of the arc of universities and medical institutions that power much of the city's economy, is enormous, and to fail to take full advantage of the space would again be short-sighted.

The North South Rail Link, by comparison, is a key that unlocks the full potential of the great Boston economic region. By connecting North and South Stations, a regional rail system can be slowly realized, knitting Gateway

Cities to the Boston Core. The four downtown transfer stations for the subway, currently crippled at rush-hour, would experience far less congestion since riders from the North Shore could disembark at Back Bay or South Station. Conversely, riders from the south shore would have access to North Station, experiencing a large amount of surrounding development, as well as potentially Kendal Sq since the Grand Junction would be freed up. All these connections could be made without using the subway, easing the pressure on the system.

By allowing the 2 sides of the system to act in concert, rail facilities such as layover yards and maintenance yards could be located in areas farther outside the downtown core without any detriment to service. The value of the land lost in the SSX to storage could potentially pay for the relocation and modernization of both the fleet, as well as new facilities.

Since the NSRL would knit Portland, ME to the Northeast Corridor, it would be eligible for Federal Funds, unlocking the potential to leverage the State's funds and achieve a more beneficial and long-lasting solution. The highways leading into and out of the city are becoming increasingly gridlocked. Having lived in Boston for 13 years, I am looking to move a little further out and start a family, and will not consider anything in the southeastern portion of the state not walkable to a Commuter Rail station, as the Southeast Expressway is perpetually traffic locked regardless of the time of day or day of the week. Bold, forward thinking solutions are needed to solve the state's eastern transportation issues, or it risks losing people to other competitive states with robust transit systems.

We are approaching a critical moment concerning the state's transportation network, one that will be looked back on in a similar way to the highways of the 70s, the expansion of the subway network in the 80s, and the big dig in the 90s. I strongly urge the state not to merely kick the can down the road with the South Station Expansion, but rather seriously pursue the North South Rail Link as the solution the state both needs and deserves. While SSX doesn't preclude the NSRL, it is hard to imagine a scenario where, after spending nearly \$2B to solve South Station's capacity issues, the state will willingly spend \$3B more on the NSRL to render the previous \$2B unnecessary.

As a Massachusetts resident, daily transit user, urban planner, and architect, I believe the North South Rail Link, and not South Station Expansion, is the solution the city, metro region, and state at large needs.

Regards,

Brian Gregory, Assoc. AIA



## Nancy Farrell

---

**From:** Woelfel, Steve (DOT) <steve.woelfel@state.ma.us>  
**Sent:** Tuesday, May 30, 2017 9:41 AM  
**To:** Nancy Farrell; Regan Checchio  
**Cc:** Paul Godfrey  
**Subject:** FW: South Station Expansion Draft EA and Section 4(f) Determination - public comment letter

**From:** David Sindel [REDACTED]  
**Sent:** Saturday, May 27, 2017 10:00 PM  
**To:** Woelfel, Steve (DOT)  
**Subject:** South Station Expansion Draft EA and Section 4(f) Determination - public comment letter

Mr. Woelfel and all concerned:

I am pleased to offer public comment in support of the South Station Expansion projects, which is one of the most important major transportation projects currently under planning by the Commonwealth. A full-sized and fully modernized South Station, reconfigured interlockings, and sufficient layover space are essential components of the high-quality commuter rail system that the region needs. It is imperative that the project be completed as quickly as possible.

I personally wish to call attention to four elements which I believe should be analyzed and included in the final design:

- The Widett Circle layover site selection, while clearly the optimal operational choice, has drawn criticism from those who wish to see the site used for new residential or commercial development. The layover facility should include decking (suitable for mid-rise development) and any necessary provisions for future ped/bike connections to Dorchester Avenue and Albany Street. This would provide the best of both worlds - the best possible layover facility, as well as space for development to increase Boston's tax base and housing stock - and the sale of air rights could pay for the decking.
- The layover facility and interlocking reconfiguration should be designed to not preclude the future construction of the North-South Rail Link. While the projects are often presented in opposition, in fact they are complementary. Both are necessary to allow the rail system to support an expanded mix of high-frequency local service, traditional commuter rail service, intercity service, and high-speed rail service to connect the region, the Commonwealth, and the entire Northeast. SSX should be treated as the first phase of a multi-decade downtown rail expansion that will also include the NSRL.
- The expanded station and reconfigured interlockings should be designed to support high-frequency (10-15 minute all-day headways) local service on the Fairmount Line and the inner Worcester Line - two commuter rail lines which run through densely populated areas underserved by current rapid transit. Consideration should be given to having a dedicated platform for each of these potential local services with convenient paths to the Red and Silver lines, as well as interlockings designed to keep these local services from interfering with commuter rail and intercity traffic.
- Currently, the route 11 bus follows a wide one-way loop which often gets stuck in Seaport traffic. With Dorchester Avenue no longer closed to traffic, consideration should be given to routing the bus on Dorchester Avenue in one or both directions, should shorter travel times (and thus higher frequency possible with the same number of vehicles) outweigh any lost connections on the current route. If such a

rerouting is pursued, the street design should include bus stop islands with bicycle lanes routed behind them.

Thank you,

David Sindel  


## Nancy Farrell

---

**From:** Woelfel, Steve (DOT) <steve.woelfel@state.ma.us>  
**Sent:** Tuesday, May 30, 2017 9:42 AM  
**To:** Nancy Farrell; Regan Checchio  
**Cc:** Paul Godfrey  
**Subject:** FW: Draft Enviromental AssessmentCo mment

**From:** Frank Demasi [REDACTED]  
**Sent:** Saturday, May 27, 2017 6:36 PM  
**To:** Woelfel, Steve (DOT)  
**Subject:** Draft Enviromental AssessmentCo mment

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

Reference: Comment on SSX Draft Environmental Assessment (DEA)

As transportation planner and logistics specialist at the Defense Contracts Management Agency (Retired 2002) I cannot support the proposed South Station Expansion Project that I believe will not solve current and future capacity requirements at the station. The South Station Expansion (SSX) Draft Environmental Assessment (DEA) is an example of the problem the Mass DOT and the MBTA has had in doing effective transportation planning. Mass DOT's Transportation plans have always been based on many fragmented special interest projects that get cobbled together that cannot possibly work together as an effective strategic transportation plan.

One of the alternatives in the SSX DEA should have been a no-build alternative with the North South Rail Link considered as a strategic cost effective solution for current and future capacity short fall inherent with the existing and proposed stub end terminal. The costs associated with the construction of added tracks and platforms would be better spent on the alternative North South Rail Link.

Rather than addressing the root cause of this gross inefficiency, the Commonwealth is currently planning to add 7 additional stub-end tracks at South Station and 2 more at North Station, at a staggering cost of about \$2 Billion. Leaving aside the cost, the addition of surface tracks simply compounds the inefficiency of the stub-end operations and adds precious little capacity for future growth. Rather than solving the underlying problem, this approach simply compounds it.

By building the NSRL we can bring our regional transportation system into the 21st century at a fraction of what it would cost to create such a system from scratch. A unified system with modern operating characteristics will attract many more riders and strongly encourage Transit-Oriented Development across the system, particularly in Gateway Cities. It will take pressure off beleaguered highways, the Red and Orange Transit Lines, while encouraging more sustainable development patterns – and a better quality of life - going forward.

Shuttling trains around our terminals and related layover yards is unproductive. Every train and crew engaged in these wasted movements requires another train and crew to be providing revenue service. A detailed study in 1998 concluded that \$62 Million per year could be saved simply by replacing stub end service with run-through service. This amount is sufficient to bond more than \$1 Billion in new investment at current interest rates.

When the North South Rail Link was evaluated in 2003 for the PMT ( Program for Mass Transportation, the official multi-year planning tool for ranking transportation investments), it was found to provide a greater diversion of riders from highway to rail and greater time savings than any other rail project evaluated for the PMT. I can be reached at [REDACTED]

Frank S. DeMasi



Laura Keenan  
Vice President  
Fidelity Real Estate Company  
200 Seaport Boulevard, Z1L  
Boston, MA 02210  
Laura.keenan@fmr.com



May 26, 2017

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

Via email: [steve.woelfel@state.ma.us](mailto:steve.woelfel@state.ma.us)

Re: Comments to Draft Environmental Assessment dated March 2017

Mr. Woelfel:

We have reviewed the Draft Environmental Assessment dated March 2017 as presented by the Massachusetts Department of Transportation. While we have many concerns about the project's impacts on Fidelity's office building located at 245 Summer Street, there are a number of concerns that we feel compelled to highlight at this time:

**Vibration, Noise and Geotechnical Impact**

The project documents depict significant construction, all of which will be in close proximity to 245 Summer Street. We ask that the project investigate geotechnical impacts of construction, including any impact on the foundation of our building. We also ask that the project continue to investigate vibration and noise for all alternatives, as the project evolves over time, and detail the impacts to 245 Summer Street to maintain the integrity of that structure and for business continuity, as that site will remain occupied as Fidelity Investments' corporate headquarters throughout construction.

We have previously opened up the side of 245 Summer Street to allow natural light into the building. We ask that the project investigate the impacts that a proposed temporary noise barrier would have on the occupants and exterior landscape of 245 Summer Street. We are concerned not only with the control of construction noise, but also the impact on the flow of natural light into the building. Further, we are concerned with the appearance of the barrier itself and how it's built (materials used, quality of construction, etc.).

### **Loading Dock**

The expansion and opening of Dorchester Ave will significantly impact the operation of Fidelity's loading dock at 245 Summer Street. Implicit in the new design is removal of a staging area currently provided. No alternative has been suggested that we are aware of. Additionally, we have been informed that "all truck maneuvering would occur off street." We ask the project to provide clarification and inform us how our existing delivery requirements will be met without impacting the surrounding environment.

### **Removal of Fidelity's Patio along Dorchester Avenue and Conversion to a Public Right of Way/Road Widening**

We have many concerns associated with the widening of Dorchester Avenue and removal of Fidelity's patio. First and foremost, we ask the project to carefully analyze the impacts to Fidelity's sensitive equipment, utility vaults and building infrastructure, all of which are located beneath the patio or immediately within the building footprint adjacent to the patio. Water, electric, telephone, data and fiber located under Dorchester Avenue provide building utilities and all need to be carefully maintained during construction to prevent disruption and ensure business continuity, including quality of water etc. Further, structural elements of the patio play a critical role in the safety/building hardening of 245 Summer Street. Any alterations affecting the patio area must be designed to maintain building hardening to mitigate vehicular and other threats, both on the Dorchester side of the building as well as on Parcel H, following removal of the security gates.

### **Maintenance of Egress**

Throughout construction, all points of egress for 245 Summer Street must be maintained for life safety. This includes the Summer Street/Dorchester Avenue corner as well as two points of egress located on Parcel H.

### **Seawall Reconstruction**

Precautions must be taken to mitigate floodwaters during the reconstruction of the seawall, especially since Fidelity maintains critical infrastructure below grade at 245 Summer Street.

### **Ground Water**

Fidelity has concerns regarding impacts the proposed changes will have to ground or salt water. It is unclear in the documents whether a study has been completed regarding this topic. As mentioned above, Fidelity has critical infrastructure below grade at 245 Summer Street which is sensitive to moisture. Therefore, we ask the project to provide us detail on the risks associated with changes to the surrounding landscape.

We look forward to the possibility of a deeper understanding regarding ways the proposed projects impact our building, our operations and our employees.

Sincerely,  
Laura Keenan

May 26, 2017

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

Via Email: [steve.woelfel@state.ma.us](mailto:steve.woelfel@state.ma.us)

Dear Mr. Woelfel:

We are writing to oppose in the strongest possible terms the continued inclusion of Widett Circle as an alternative site on which to park trains, as is articulated in the Draft Environmental Assessment Alternatives Analysis MassDOT has submitted to the Federal Railroad Administration.

As we commented last June in a similar letter to MassDOT, the taking of this property would have far reaching consequences on our 21 private businesses and 900 employees. As the only private property being considered for a layover site, taking our land will be a crushing burden on the budget of the taxpayer funded, public agency, MassDOT. Further, such a taking would have a significant negative effect on the City of Boston's non-professional employment, and ignores the City of Boston's extensive planning efforts for the Dorchester Avenue corridor, and the broader vision articulated in Boston's Draft Imagine 2030 plan released in November 2016.

As described in the Imagine 2030 document, the envisioned uses for this economically vibrant location include the following,

**Knit together neighborhood fabric through new housing and job growth**

Encourage mixed-use housing and job growth in Newmarket/Widett to strengthen physical connections between Roxbury and Dorchester and job centers on the South Boston Waterfront and Downtown.

**Expand jobs along the Fairmount corridor** Strengthen industrial jobs in Readville, provide significant space for new places to work at Newmarket/Widett, and encourage job growth and training in neighborhoods along the Fairmount corridor, including supporting the neighborhood innovation district between Dudley Square

(<http://20222-presscdn.pagely.netdna-cdn.com/wp-content/uploads/2016/11/lb2030-Vision-Report-WEB-2016-11-17-SPREADS.pdf>, pg.192)

Obviously this vision is inalterably inconsistent with the proposal to use Widett Circle as a location to park trains when they are idle, which is clearly not the highest and best use of our land.

To the hard-working members of the New Boston Foodmarket Cooperative Corporation, this process has taken on a Groundhog Day quality. Over and over again in the past 15 years we have been informed that one entity or another has decided what is best for the property that we own, that we maintain, and on which we run our businesses and provide steady and quality employment opportunities. We, therefore, reiterate our comments sent to MassDOT in June of 2016.

Widett Circle is home to our cooperative corporation, New Boston Food Market (NBFM). The 21 businesses in our co-op are in the food service and food processing industry, providing over 900 individuals with valuable blue-collar jobs in the City of Boston. Widett Circle is the perfect location for our thriving businesses, which service many if not most of the restaurants, grocers and food suppliers in Boston and Massachusetts. Access to the highways for our hundreds of refrigerated trucks, which serve our customers, is imperative to the success of our businesses. Our collective businesses at Widett Circle generate more than \$1 billion in revenues annually.

As the owners of the 21 businesses here we-- along with our 900 employees-- are tired of reading about the use of our private property on the pages of the Boston Globe or in publicly released documents. Throughout our 40-year history in Widett Circle, we have been happy to stay out of the spotlight, arriving on site at 4:00am and working hard to provide the majority of Boston's high-end, quality protein—fish, meat and poultry.

In 2014 we sent a letter to MassDOT and the Executive Office of Environmental Affairs to express our opposition to the consideration of Widett Circle as a potential layover site for the South Station Expansion. We had what we believed to be a good dialogue with officials from MassDOT and left with a level of comfort that we would be treated with respect, with an understanding of the scale and breadth of our commerce, and that our property was not likely to be considered in this project, but that any future steps would be communicated directly from decision-makers at MassDOT.

As mentioned above, we again provided comments in June of 2016, and were surprised and disheartened to read in the Draft EA that "(t)he Secretary of the EEA requested the Widett Circle site also be carried forward for further evaluation in the DEIR."

The continued inclusion of our private property in MassDOT's review absolutely paralyzes our businesses. We are afraid to make investments in our property and infrastructure, expand our employee base or pursue new customers because of our unknown fate. And you can imagine the hesitation of lenders to even consider doing business with us when our future is at risk.

We have been in discussions with brokers and developers on plans to purchase Widett Circle from our co-op in order to redevelop the entire site in to a mixed-use project. A major component of those conversations has been the successful relocation of all of our businesses to a site within City limits, with newly developed, state-of-the-art facilities, and excellent access for all of our 21 businesses. But, these conversations have been thwarted as a result of

MassDOT's decision to continue to evaluate Widett Circle in their South Station Expansion project.

Further, it is fiscally irresponsible for MassDOT to be considering the taking of private land from thriving businesses using taxpayer money, when there are viable public property alternatives. The market value of our property and the cost of relocation of all of our businesses, especially now, is surely well beyond a reasonable budget for what MassDOT should be investing in a layover facility for South Station. The economics of this plan needs to be considered and shared, not only with appropriate decision-makers at MassDOT, but also with the taxpayers who are inevitably paying for this plan.

Finally, Mayor Martin Walsh has made it clear to us, as business owners and employees, that New Boston Food Market is important to him and to Boston's manufacturing economy. We regularly communicate with him and his staff to foster long term growth and economic development for this underutilized portion of the city. A significant amount of time, effort and dialogue has occurred with this administration regarding how New Boston Food Market can participate in this activation, including identifying a new home for our thriving businesses within the City. We are bewildered that MassDOT, and the Secretary of EEA continue to ignore our concerns, and ignore the efforts of the Mayor and his staff by including Widett Circle for a layover site, a terrible use for the point of entry to Boston.

We urge MassDOT and the Federal Railroad Administration to recognize NBFM as one of the most important manufacturing assets in the City of Boston. We demand MassDOT to deem Widett Circle impractical for its considered use, and eliminate it from further consideration as a layover site. We would like to get back to business without the fear that your agency is going to take our property.

Respectfully,

*Marion L. Kaiser*  
C.E.O.  
Aquanor Marketing Inc,

*Jeffrey Corin*  
President  
Robbins Beef Company

On behalf of:  
**The Board of Directors,  
New Boston Food Market Development Corporation**

Steven H. Olanoff

May 27, 2017

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

Re: South Station Expansion Project -- Draft Environmental Assessment

Dear Mr. Woelfel:

As a past chair of the Regional Transportation Advisory Council (4 terms) and currently the alternate TRIC Subregion representative to the Boston Region MPO, I want to add my voice to the significant number of well-informed individuals and organizations that are commenting on the SSX Draft Environmental Assessment. I join them asking for a full FEIS to be conducted to study the North South Rail Link as an alternative to the SSX.

I will not duplicate all the details that are being presented by others. I will just say that I have studied both the NSRL and SSX for many years and feel fully confident that if the four alternatives of No-build, SSX alone, NSRL alone, and both SSX and NSRL together were fairly and objectively studied under a full FEIS, then the NSRL alone alternative would be chosen as the preferred alternative. This is based upon engineering, cost, logistical, and economic considerations. The vast economic benefits of the NSRL compared with the very doubtful net gains of the SSX would come out in such a study and, I think, demonstrate that the SSX project should be dropped in favor of the NSRL.

Given the transportation funding problems in the Commonwealth, we should not be wasting any money or time in pursuing the literal dead-end solution of South Station expansion. Going with an FEIS that compares the two projects would settle this matter in the accepted manner and enable us to move forward with a viable solution to the critical transportation problems that face our region.

Sincerely,



Steven H. Olanoff

**Submission on I-90 Allston Interchange Project  
and South Station Expansion**

*within an Environmentally Responsible Plan for inside route 128\**

to help conform to

THE MASSACHUSETTS HEALTHY TRANSPORTATION COMPACT

by

Dr Robin Pope

May 26, 2017

To: MassDot

Nathaniel Curtis,  
Howard/Stein-Hudson, Public Involvement Specialist  
Tel: (617)482-7080 x236  
Email: [ncabral-curtis@hshassoc.com](mailto:ncabral-curtis@hshassoc.com)

Patricia Leavenworth,  
PE, MassDOT, Chief Engineer  
10 Park Plaza, Boston, MA, 02116  
Attn: Bridge Project Management – Project File No. 606475

Stephanie Pollack  
Secretary & Chief Executive Officer, Department of Transportation  
[stephanie.pollack@state.ma.us](mailto:stephanie.pollack@state.ma.us)

Mr. Steve Woelfel  
South Station Expansion Project Manager  
Deputy Director,  
MassDOT Office of Transportation Planning  
Email: [steve.woelfel@state.ma.us](mailto:steve.woelfel@state.ma.us)

Dear Nathaniel, Patricia, Stephanie, and Steve, and through you four, MassDot

I have appreciated, Nate, your concern and openness in holding public meetings, and attending those held by others, and feel your concern and your courtesy, including to myself. This state, this country, and the planet are at a cross road. You are in a pivotal position to get us the right path. The below is to assist this by placing before you the wider matters in your stewardship of how people travel and live.

It points you also to some funding issues for non-profits such as private universities. These house for profit professors earning consulting fees, and benefit from their employees being able to travel without paying taxes to help fund MassDot. Institutions of higher education have obligations to aid you in your Massachusetts Healthy Transportation Compact, not play the devil, adding to bad health and non-sustainability in how they have grown as mini cities within this Commonwealth.

I ask that you pass my submission on to the governor and the legislature, as well as acting on it yourselves.

*Background:* The National Institute of Medicine attributes the US's lousy longevity record compared to other rich countries first and foremost to its over-use of automobiles. Through excess use of vehicles, especially 1-person cars, Massachusetts residents: die sooner, suffer unnecessary mental and physical illness through traffic accidents, traffic pollution unable to enjoy nature and being face-to-face with others or exercising their limbs since spending so much of each date sitting in front of their car wheels. Insufficiently physically and socially challenged, Massachusetts residents are less happy, produce less efficiently produce; create an anti-social, polarized society; and contribute to climate damage.

To help fulfil the Massachusetts Healthy Transportation Compact, MassDot's plans for the I-90 Allston Interchange Project need to assist in having, in all societal strata, far fewer travelers going by car to work and events. This amounts to a revolution for we are in a war for our health and our planet. The changes proposed below are dramatic. Yet unlike the typical changes brought about by wars, these changes are with *immediate* benefits locally, and beyond Massachusetts. The revolution can happen inside a year, from

---

\* its seaward side with a south boundary added

MassDot taking initiatives that rapidly get miles travelled on average halved, and far more of that travel done by walking, running, cycling or using public transport.

**People cannot make the changes to this by themselves, much as many want it ardently. It needs coo-ordination, with you MassDot, a natural lead coordinator**

Methods I advise including the following. Not all are directly in your MassDot jurisdiction, hence my request that you pass my submission on to the governor and the legislature as the three bodies combined can make the package more effective. If you turn out to be limited to those only in your direct jurisdiction, that alone can help much in your fulfilling the Massachusetts Healthy Transportation Compact.

- a) Impose heavy penalties on institutions –including non-profits like universities, who fail to decentralize having enough space in their current buildings for a proportion of employees to live on site – including an adequate proportion of their employees (or sub-sub-sub-contractors) who are at the bottom end economically to assist in reversing some of the extreme inequality that has arisen since 1970 in Massachusetts. Require the conversion of much current parking space to bike storage, showers for those running or cycling to the office, lockers in which runners and bikers keep clothes for getting in and out of their office attire, as well as the conversion of some of those parking garages into residential accommodation, with their top floors green space.

Achieving this requires businesses, governments and non-profits to turn roughly half of each office block into residential, and exporting outside the seaward side of the 128 route, that half their downtown office space converted into being residential. This will be relatively simple since many who presently commute downtown from the hinterland have unused rooms in their suburban houses which they would gladly convert to office use, with some who live nearby joining them, and will be pleased to only go their downtown office one or two days a week. There will be other delighted to live downtown instead of the lengthy daily commutes in from the suburbs, and quite a few of these will be ready to have the residential conversion extent of erstwhile office modest – no more than showers getting installed somewhere, and plugging in an electric cooker for their food. Many may discover it a healthier lifestyle to revert to medieval world heritage Porto in Portugal where the toilet, bathing and washing blocks are external – in this reconfiguration in floors of that office block's parking space where with the reduced number of cars, less than a quarter are needed now for cars.

- b) More than double capacity on public transport, in a few months by more frequent services, in half a year by adding new routes for buses and in the longer term new routes for trams including h), j), m) and n) below. Even before capacity on public transport has been doubled, use a number-plate allocation and other rules to reduce vehicular traffic to about a quarter, and concomitantly by more than doubling car occupancy rates. The incentive to double occupants per car is a limit on when cars can penetrate the 128 route. This limit not only incites use of public transport but carpooling. Allow cars only inside the 128 route 1-day a week, eg car plates A-E Monday, F-G Tuesday etc; with other rules limiting other sorts of private vehicles (vans, trucks and so forth). Comparable limits on access days should be imposed by number plate on cars from other states. In so doing, Boston is catching up on what wise cities have done for decades in limiting car access to congested areas. On carpooling, with the internet, less than a month would be needed for each council to set up sites for its residents to find others living close enough for work or special events inside route 128, and in addition private firms would sprout offering to put those seeking to travel in touch with others going at a similar time to a similar spot. The combination of more public transport capacity and restrictions on when each car number plate can cross route 128 getting car traffic down to about a quarter of what it is now would cut the atrocious time waste from congestion suffered by those travelling on the seaward side of route 128. It would economize on time and car congestion despite the big reduction in road space from implementing d) and e) below.

- c) Get car occupancy rates up beyond double what they are now. Get car occupancy up to treble or quadruple the current mode of one person per car passengers by imposing penalties that rise steeply with the value of the car for infringements so that police make a profit for the state in a simple way, car values being simple to ascertain. Put a big surcharge on use of taxis, Ubers etc that goes to subsidize public

transport. Put a penalty on cars carrying less than four people inside 128, or if containing a handicapped person where one car seat goes for a wheel chair, less than three persons. Require all buses, shuttles for the handicapped, hotels, universities to be willing to pick up passengers when they have spare seats at specified points to avoid the current environmental waste of these being often half empty. all these measures help create the revolution in attitude from vehicular driving seen as natural, to vehicular driving seen as only to be done in special circumstances.

- d) It is a disgrace of wider Boston that the sacred river stretch is desecrated with vehicles pouring pollution on those using the stingily narrow stretch on each side. Boston and Cambridge have far more wealth to create here something comparable to New York City's Central Park than had that city at the time it invested in its park. End vehicular traffic entirely alongside the Charles Basin/River ie on what in the basin is Storrow and Memorial Drive and their extensions in each direction.

All properties are accessible by *other* roads so these *riverside* roads are not necessary for riverside residents\*\* –filled with commuter cars transiting. Note that this should be combined with measure b) to ensure that despite these riverside roads being closed to vehicles, there are so many fewer vehicles on the road each day, that travelers would get to and from venues faster. The following use should be made of the width of two lanes in each direction on these river roads after they are closed to cars and trucks. On the lane farthest from the river, should be built one tram line (with occasional crossover lines to allow trams in opposite directions to pass each other). The next lane should become two bicycle lanes. The two lanes closest to the river should be converted to nature, with more urban wild areas created. The river itself cleaned for swimming, above all as global climate change accelerates so that being in the water is not merely exercise, but heat escape in summer.

On the river banks, the white geese re-given the access on both east and west of their nesting area. The wanton deprivation of the white geese, and of locals and tourists who previously found such pleasure in them and their pure gold chicks in the spring is being described and depicted with photographs, in a letter of Robert La Trémouille to Stephanie Pollack.

These recommended changes should not be made under the Department of Conservation and Recreation since it has failed in both its recreation and conservation duties. In the last two years, it authorized wanton destruction of 150 mature trees, east of the Boston University boathouse, permitted contractors to generate atrocious erosion and put in paths so shoddily surveyed that they are more under water then the prior ones, and done plantings unsuitable for wildlife and people wishing to enjoy views of downtown and be among wildlife.

- e) The MassTurnpike I-90 should be cut from 4 to 2 lanes in each direction on the sea side of 128 route. With measure b) this will have faster flow than the current 4 lanes. The halved width should be with a full above ground tunnel encasement in the area where it is above the rail west from the BU bridge. It should go rapidly back onto ground level after the planned new west station.
- g) Vehicular traffic should cease on the BU bridge and Brookline: the former tram of the 1920s should be reinstated up to Massachusetts avenue.
- h) As in the suggestion made some years ago by Robert La Trémouille, a green/red connector, should go from the river side of west station through Harvard property to the red line. This writer notes it can be built entirely at Harvard's expense. Harvard is a mini-city within greater Boston, and ought to become far more environmentally responsible than its past practice of worsening pollution and climate change by having so many vehicular commuters, and contributing to inequality by reducing rather than expanding the percentage of affordable housing under its ownership. Overly centralized medical complexes exacerbate travel and damage the climate. The commonwealth of Massachusetts and MassDot should coordinate to ensure that Harvard's new medical complex is smaller so that over 90%

---

\*\* Even the row boat houses have roads at right angles to the river very close for carrying in by hand boats.

of its patients and employees come on foot, bike or by public transport. The new complex should also be smaller given evidence of the US being over medicalized: medical errors are its third leading cause of death.

- i) West station should be where Harry Agganis Way takes a left bend toward Parking Lot C-1 that should be pre-empted from Boston University for the station. With respect to this pre-emption, note that universities need to become more environmentally responsible by curbing car usage, and thus curbing the amount of space that they currently squander of parking. The construction and maintenance of West Station should be paid for by its two major beneficiaries, Boston University and Harvard University.
- j) A green line extension should run to West Station from Commonwealth Avenue along Harry Agganis Way. It is very bad planning to have West Station without access to the green line. Placement of that station as in i) does this and gives ready public transport to the Boston University playing fields obviating the need for parking lots by it. This short green line extension should be paid for by Boston University. It may be feasible to have a driverless tram going back and forth every few minutes on this short stretch.
- k) A small station (for which there is room) at the junction of the commuter rail and Commonwealth Avenue at the Boston University bridge to connect with the tram spur extension of g) above, as also to give an alternative connection to the green line for rail commuters without needing to go along Harry Agganis Way
- l) The reduction of I-90 to 2 lanes each way under e) would furnish a width of 4 lanes of extra green space on the Boston side of the Charles that should be used entirely for nature. Care should be taken to present the nature in place which differs from that in other river segments, and to introduce more urban wild. The river bank on both sides is boringly sanitized and with inadequate wildlife. In managing this, for the reasons given in d), use of the Department of Conservation and Recreation should be avoided, as
- m) Grand junction could take a single commuter car from west station across the river, by hooking an extra engine on each of its ends and offload and upload these at a small platform by either Fort Washington or Pacific Street, for which there is ample room in both spots, and that will primarily serve MIT rental property and MIT students and employees located nearby that are in a tram public transport vacuum, and one that would not be filled fully by n). The one-car train can reverse before Massachusetts Avenue, by its having an engine on both ends. It therefore would not generate the problems of more trains, and trains in peak hour crossing Massachusetts Avenue. The number of such one-car trains should be limited to at most two mornings and two evening to keep adequate quiet for the white geese, and for Cambridgeans and Bostonians who much appreciate having that wee nook between the Boston University Boathouse and the Boston University bridge to experience being in an urban wild.
- n) A green/red connector from Yawkey station to Kendall Square paid for by MIT since its people will be the main beneficiaries
- o) Arrange a retraction by (i) MIT (its 2014 report on this path), (ii) the Cambridge City Council (its 2006 project on this path), and (iii) former Mayor Davis, of plans for an alleged bike path along Grand Junction. The plan is spurious, the sort of double dealing disgraceful on the part of all three parties. The plan requires stunt rider skills plus of the bikers on the river side of Memorial Drive and on the inland side, wastefully duplicates a much superior bike path along Vasser Street. La Trémouille has been earnest and energetic in his public duty to alert on where projects damage wildlife and human communities, and furnishes evidence words plus photographs in a letter to you Stephanie Pollack that the bike path plan is a pretense, a plot to bring cars off the turnpike after getting approval is granted for the other. The cars along Grand Junction combined with the needed fence, would devastate the white geese, remove valuable forms of nature growing by the rail track and much of the urban wild between the Boston University boathouse and bridge. Relatedly, MassDot should ensure that MIT in its upcoming Kendall Square redevelopment, halves the area's car traffic.

- p) Recall that the failure to introduce environmentally wise gasoline taxes in the 1970s was a failure to curb excess car usage. Recall that the failure arose largely from inability to devise a plan acceptable to congress on how to compensate the poor for higher gasoline taxes. Hence, while it is important to get the shift out of car travel, it is even more important than back in the 1970s, to do so without imposing extra costs on the poor since inequality is not so much worse than earlier. The Commonwealth of Massachusetts will have considerable savings from the halved turnpike width in the area, in maintenance, in police required, and in health costs. Its fines and taxi surcharges under c) will also yield revenue to assist in furnishing free public transport in this area. Seaward of route I28, MassDot would thus have enough extra revenue likely to make public transport free, something sensible when properly costed for externalities, it would be free, and cars almost none existent. In addition, to entice businesses and universities in how they redevelop areas, to generate inclusive neighborhoods and not shove the poor into remote ghettos, require employers to furnish all employees earning below the median wage free public transport from their homes to the employment place.
- q) With the measures of p) in place the poor are protected from facing higher costs in shifting from cars to public transport and living close to where they work, the Commonwealth can use price hike to switch people out of car driving. The Commonwealth should charge enough more for car licenses and car parking to cover its massive increase in public transport, explaining to people how by over-driving, they are damaging their own mental and physical health, social and natural environment as well as generating more global warming. The Commonwealth should also increase property taxes to this end, using some of the extra raised on nature and environmental education. It should explain to people that a high proportion of the overall property price rise, that in the unimproved value of land, comes from community decisions, so is not something earned by the property holder, but something that rightfully belongs to the government. The Commonwealth should also explain how the community needs more money from higher taxes to protect property owners by investing in public transport and educating people about nature and climate change to avoid more acts damaging the environment and the climate such as those of the Department of Conservation and Recreation. MassDot can go a long way in this revolution just using on public transport its gigantic savings from fewer cars on roads. It can go even further if the Commonwealth agrees to raise property taxes to use in converting turnpike lanes, roads, and car parks into public transport, bicycle paths and nature.

I wish you well in the splendid opportunity you have through implementing proposals such as a) to q) above. You can take steps toward the Massachusetts Healthy Transportation Compact that can make the Commonwealth a beacon of health and happiness imitated worldwide.

I have many more suggestions, and details on each of the above, and on how to impart the healthy vision. Feel free to phone or email me.

May greetings, and please confirm receipt of this submission.

Dr Robin Pope





CITY OF BOSTON • MASSACHUSETTS

OFFICE OF THE MAYOR  
MARTIN J. WALSH

May 26, 2017

Mr. Stephen Woelfel  
South Station Expansion Project Manager  
Deputy Director, MassDOT Office of Transportation Planning  
1010 Park Plaza, Suite 4150  
Boston, MA 02116

Re: Draft Environmental Assessment (EA) and Draft Section 4(f) Determination for South Station Expansion (SSX) Project

Thank you for the opportunity to comment on Draft EA and Section 4(f) Determination for the South Station Expansion (SSX) project. Exploring ways to expand capacity within our transportation system, including at South Station, is important for improved mobility throughout Boston, Eastern Massachusetts, and the broader Northeast Corridor region. Moreover, the South Station Expansion project has the potential to advance or preclude many of the City's core planning goals as articulated in Imagine Boston 2030, Go Boston 2030, and Climate Ready Boston, including:

- **Imagine Boston 2030 – Expanded Neighborhood at Newmarket/Widett**  
In the City's long range plan, we envision Newmarket / Widett Circle to be an area of significant new growth for mixed-use and residential development. South Station Expansion should be done so as to support – not preclude – this from occurring.
- **Imagine Boston 2030 – Mixed Use Job Center at South Station**  
In the City's long range plan, we envision the Financial District & South Station area continuing to evolve into a mixed use job center. South Station Expansion should be done so as to allow for joint air rights and terra firma development in the area.
- **Go Boston 2030 – Improved Regional Transit**  
In the City's long range mobility plan, we call for more reliable and frequent regional transit. South Station Expansion must be able to facilitate this and, in particular, not preclude the future conversion to an electrified system operating trains at subway-level frequency.

- **Go Boston 2030 – Improved Local Connections**  
In the City’s long range mobility plan, we call for more pedestrian and bike friendly communities. South Station Expansion must be able to facilitate the re-opening of Dorchester Avenue along Fort Point Channel, enhancing local circulation and better walking & biking connections to this regional hub.
- **Climate Ready Boston -- Enhancing climate resiliency along the waterfront**  
In the City’s long range resiliency plan, we call for infrastructure that is capable of addressing future climate shocks and stresses. South Station Expansion must be built mindful of future sea level rise and storm surge, and not precluding resiliency investments along the channel.

We want to stress that specific comments that follow should be viewed in the context of these larger city building goals.

The City of Boston (City) has been coordinating closely with the Massachusetts Department of Transportation (MassDOT) on the SSX Project. We therefore ask that the Federal Rail Administration (FRA) and MassDOT consider the following:

**USPS Relocation and Associated Transportation Network Improvements in the South Boston Waterfront Area**

This project would relocate the United States Postal Service (USPS) General Mail Facility (GMF) to a site in the South Boston Waterfront. The identified site is largely comprised of property owned by the Massachusetts Port Authority (Massport) and includes smaller parcels that are owned by the Department of Defense (DOD). This site’s development would also include the extension of E Street to Summer Street and the subsequent elimination of Fargo Street between E Street and Summer Street. This street realignment would allow for an expanded site for USPS and better transportation circulation for vehicles and trucks. This element of the SSX project is notable because it will require close coordination between DOD, MassDOT, City, and other stakeholders. We therefore urge continued progress and coordination between federal departments and agencies in advancing this work with MassDOT and the City.

**Air Rights Development at South Station and Widett Circle**

While the City supports the EA Alternative 1 “Transportation Improvements Only” program for SSX, we also recognize that preserving opportunities for air rights and terra firma development at South Station must not be precluded. Just as the relocation of the USPS facility will make land available for track expansion, it will also create terra firma and air rights development opportunities along a re-opened Dorchester Avenue. Due to the complexities of air right development, it is also crucial that the new tracks and platforms allow for the structure support elements to ensure that feasibility of future air rights development. We look forward to resuming collaboration with MassDOT in the near future on a master plan to unlock this development potential.

Additionally, the City continues to have concerns over the proposed Widett Circle layover site. Currently this location provides an important home for many food processing businesses which represent a unique part of the City's economy. In the longer term, this area is one of the largest remaining locations for transformative growth and economic development near the heart of the City. In fact, the City's draft long term Citywide Plan, Imagine Boston 2030 (IB2030), identifies Widett Circle as an area for mixed use, transit-oriented development that helps to reknit the urban fabric of the City and strengthen connections between neighborhoods. Significantly, IB2030 also highlights the need for resiliency to be a guiding principle for development in the area given that Widett Circle lies in the 100 year floodplain (only within 500-year flood zone) and is susceptible to future flooding from sea level rise.

Therefore, if a layover facility is located in this area, MassDOT must invest in infrastructure to support future air rights development, enable connections to the existing adjacent street grids (such as West 4th Street in South Boston), and include strategies to address sea-level rise and resiliency. Air rights development is highly complex, and it is crucial that MassDOT design new tracks and rail infrastructure to not preclude air rights development in the future.

### **Head House Design**

The proposed head house layout represents a significant improvement over the prior design in terms of functionality, practicality, and maximizing opportunities for terra firma development. The opportunity for terra firma development particularly significant since joint development will provide opportunities for housing and economic development, help to reknit the fabric of the City and create a sense of place along a reopened Dorchester Avenue and Fort Point Channel.

### **Urban Rail**

The infrastructure associated with SSX must be built to not preclude future urban rail service on key corridors leading to South Station. Urban rail service would entail higher-frequency passenger rail service on key MBTA Commuter Rail corridors such as the Fairmount Line and Worcester Line between Boston and Newton. The service would use rail equipment that is compatible FRA safety standards for passenger rail operations but more conducive to shorter-distance passenger movements. Key elements for the City's vision for urban rail is detailed in Go Boston 2030 and IB2030.

Therefore, in the design of SSX, MassDOT must consider the following:

- South Station must be designed with sufficient platform space to accommodate future urban rail needs;
- MBTA Commuter Rail maintenance and layover facilities must be designed to accommodate urban rail equipment, such as DMUs or electric multiple units; and
- Track design must not preclude future use of the "Track 61" corridor which would provide passenger rail service to the South Boston Waterfront from the Back Bay.

## Multimodal Network Interconnection Improvements

The City continues to work collaboratively with MassDOT and the MBTA on refinements to improvements to connecting modes. This includes surrounding traffic management improvements, curbside access refinement, shared transportation enhancements and connectivity improvements to other transit modes.

The most significant surface transportation improvement that is part of this project is the re-opening of Dorchester Avenue. The City would like to see this connection made as soon as possible and for at least pedestrian, bicycle and Harborwalk access on an interim basis as soon as possible following the relocation of the USPS.

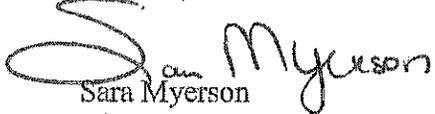
## Climate Adaptation

We applaud MassDOT's leadership in its continued planning and analysis of transit infrastructure risks posed by projected climate change and sea-level rise. MassDOT's Boston Harbor Flood Risk Model indicates a 3-foot rise in sea level, which we could experience as soon as 2070, combined with a coastal flooding event could inundate portions of South Station and Widett Circle.

The elevation of Dorchester Avenue and hardening of rail infrastructure to limit damage from sea water intrusion will function to protect South Station from future coastal storm flooding. As South Station is part of a larger integrated rail system, impacts from cascading failures associated with extreme heat, precipitation, and storm events must also be reviewed for vulnerabilities. We ask that any project alterations to Widett Circle include increased elevations and other measures to prevent flood path risks to upland and surrounding neighborhoods. Also, we ask for further examination as to whether there are opportunities for an integrated flood defense system in and along the Fort Point Channel that could offer protection to the South Station, Fort Point areas and neighborhoods proximate to Widett Circle.

Again, we appreciate very much the opportunity to comment on this significant project.

Sincerely,

  
Sara Myerson  
Director of Planning  
Boston Redevelopment Authority

  
Chris Osgood  
Chief of Streets  
City of Boston



U.S. Department  
of Transportation

**Federal Railroad  
Administration**

1200 New Jersey Avenue, SE  
Washington, DC 20590

**March 29, 2017**

Brona Simon  
State Historic Preservation Officer  
Massachusetts Historical Commission  
220 Morrissey Boulevard  
Boston, Massachusetts 02125

**Re: South Station Expansion Project  
Continuation of Section 106 Consultation  
Finding of Conditional No Adverse Effect  
MHC# RC.53253; EEA#15028**

Dear Ms. Simon:

Thank you for your letter to the Federal Railroad Administration (FRA) dated March 1, 2017, regarding the Massachusetts Department of Transportation's (MassDOT) proposed South Station Expansion (SSX) Project. Your letter responded to FRA's letter dated January 30, 2017 regarding FRA's proposed Conditional No Adverse Effect finding for the SSX Project.

In FRA's November 23, 2016 letter to MHC, FRA made a *Conditional No Adverse Effect* finding, provided that MassDOT meet four conditions to eliminate potential adverse impacts of the SSX Project on historic architectural properties. In your most recent letter, you requested that FRA modify the fourth condition and resubmit an updated *Conditional No Adverse Effect* finding to MHC. FRA has modified the condition in accordance with MHC's request. The other three conditions, presented below, are unchanged from FRA's November 23, 2016 letter.

- MassDOT will develop and implement a Construction Management Plan/Noise Control Plan to ensure construction noise is in compliance with Federal Transit Administration and City of Boston construction noise limits. Performance criteria will be developed for all noise-sensitive sites and a monitoring program will be followed throughout construction.
- MassDOT will install a noise barrier along the easternmost track on the Dorchester Avenue side of Boston South Station to minimize or eliminate adverse noise impacts to properties to the east, including the Fort Point Channel Historic District. The USPS GMF currently serves as an effective noise barrier; with the eventual removal of this building, a new noise barrier will need to be installed. Detailed information about the new noise barrier is available in the FEIR and forthcoming EA.
- The Fort Point Channel east seawall will be raised 1.5 feet along an approximately 700-foot section of the east seawall along Dorchester Avenue to match the elevation of the adjacent east seawall to the north and south. The seawall will match the existing in material, size, color, texture, and configuration. The work will be undertaken in accordance with the Secretary of the Interior's Standards for Rehabilitation.

The fourth condition originally stated:

- MassDOT will design all new construction in accordance with the aforementioned Design Principles and the SOI Standards for Rehabilitation and guidelines for new construction. MassDOT will submit project plans to MHC for review at the 30% and 60% design phases. MassDOT will address any MHC concerns prior to finalization of the plans. Interested consulting parties will also be given the opportunity to review the 30% and 60% design plans.

MHC requested that FRA modify this condition to include language allowing the consulting parties to comment on the design plans along with MHC. Accordingly, FRA proposes that the condition now read:

- MassDOT will design all new construction in accordance with the aforementioned Design Principles for the project and the SOI Standards for Rehabilitation and guidelines for new construction. MassDOT will submit project plans to FRA, MHC, and the other consulting parties for review at the 30% and 60% design phases. If any consulting party provides substantive comments on the 30% and/or 60% design plans, MassDOT will respond in writing to the consulting party with an explanation of how its comments were considered or addressed. MassDOT will forward MHC any comments from consulting parties and MassDOT's responses to those comments. If any comments from FRA, MHC, or another consulting party lead to MassDOT making substantive changes to the design plans, MassDOT will inform all the parties of the changes and provide another opportunity for review. If necessary, MassDOT will schedule a meeting(s) with FRA, MHC, and the other consulting parties to resolve any outstanding concerns or objections. MassDOT will consider substantive input received from any consulting parties that choose to comment, and will address any MHC concerns prior to finalization of the plans.

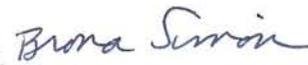
FRA and MassDOT believe this modified fourth condition addresses your concerns and we hope MassDOT's commitment to adhering to all four conditions will allow you to concur with FRA's *Conditional No Adverse Effect* finding for the SSX Project. If you have additional questions or concerns, please contact me at (202) 366-0340 or [laura.shick@dot.gov](mailto:laura.shick@dot.gov). FRA looks forward to a response within 30 days of MHC's receipt of this letter.

Sincerely,



Laura Shick  
Federal Preservation Officer  
Environmental & Corridor Planning Division  
Office of Railroad Policy and Development

cc: Amishi Castelli, FRA  
Stephen Woelfel, MassDOT  
Essek Petrie, HNTB

CONCURRENCE.   
5/9/17 BRONA SIMON RC.53253  
STATE HISTORIC  
PRESERVATION OFFICER  
MASSACHUSETTS  
HISTORICAL COMMISSION



# United States Department of the Interior

OFFICE OF THE SECRETARY  
Office of Environmental Policy and Compliance  
15 State Street – 8<sup>th</sup> Floor  
Boston, Massachusetts 02109-3572

June 20, 2017

9043.1  
ER 17/0235

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

**Subject: Draft Environmental Assessment and Draft Section 4(f) Evaluation  
South Station Expansion (SXX) Project  
Boston, Suffolk County, Massachusetts**

Dear Mr. Woelfel:

The U.S. Department of the Interior (Department) has reviewed the Draft EA and Section 4(f) Evaluation for the South Station Expansion Project. The project would expand the South Station train terminal and construct rail layover facilities at Widett Circle and the Readville Train Yard. The project would result in *de minimis* impacts to the Fort Point Channel Seawall, which is a contributing element of the Fort Point Channel Historic District. The Department has no comment on the Draft EA or the Section 4(f) Evaluation.

Thank you for the opportunity to review and comment on this project. Please contact me at (617) 223-8565 if I can be assistance.

Sincerely,

Andrew L. Raddant  
Regional Environmental Officer

cc: SHPO-MA (Brona.Simon@state.ma.us)  
FRA (amishi.castelli@dot.gov)