5.3. DEIR Comment Letters

Table 5-1 lists the identifying letter number, commenter, affiliation, and date for each comment letter received by MEPA. The annotated comment letters follow this table.

Table 5-1 — List of DEIR Commenters

Letter Number	Commenter	Affiliation	Date
C	DEIR Certificate	MEPA Office	12/31/2014
Government Agencies			
1	John D. Viola, Deputy Regional Director	Massachusetts Department of Environmental Protection - Northeast Regional Office (MassDEP - NERO)	12/24/2014
2	Kairos Shen, Director of Planning, Boston Redevelopment Authority; Vineet Gupta, Director of Policy & Planning, Boston Transportation Department	City of Boston	12/15/2014
3	Brona Simon, State Historic Preservation Officer	Massachusetts Historical Commission	12/24/2014
4	John P. Sullivan, Chief Engineer	Boston Water and Sewer Commission	12/24/2014
5	Marianne Connolly, Sr. Program Manager, Environmental Review and Compliance	Massachusetts Water Resources Authority	12/23/2014
6	Bruce Carlisle, Director	Massachusetts Office of Coastal Zone Management	12/23/2014
7	Martin Pillsbury, Environmental Planning Director	Metropolitan Area Planning Council	12/24/2014
8	Stewart Dalzell, Deputy Director, Environmental Planning & Permitting	Massachusetts Port Authority (Massport)	12/23/2014
State Elected Officials			
9	Michael E. Capuano	Congressman (Massachusetts 7th District)	12/24/2014
10	Sean Garballey	State Representative (Arlington)	12/24/2014
11	Frank I. Smizik	State Representative (15th Norfolk District)	12/23/2014
12	Bruce Tarr	State Senator (1st Essex and Middlesex District)	12/23/2014
Educational Institutions			
13	Gary Nicksa, Senior Vice President for Operations	Boston University	12/24/2014
14	Katherine N. Lapp, Executive Vice President	Harvard University	12/18/2014
Organizations			
15	Vivien Li, President	The Boston Harbor Association	12/24/2014
16	Richard J. Arena, President	Association for Public Transportation	12/23/2014
17	Marion Kaiser, Director Jeffrey Corin, Director	New Boston Food Market Development Corporation	12/22/2014

Letter Number	Commenter	Affiliation	Date
18	Paul Guzzi, President and CEO	Greater Boston Chamber of Commerce	12/17/2014
19	Paul Nelson, Senior Transportation Planner	Medical Academic and Scientific Community Organization (MASCO)	12/23/2014
20	John Kyper, Transportation Chair	Massachusetts Chapter of the Sierra Club	12/22/2014
21	Sue Silver	Don't Dump on Us Task Force	12/23/2014
Individuals and Businesses			
22	Paola M. Ferrer, Galen M. Nook, Rich Parr, Jessica Robertson (residents of Allston), Anthony D'Isidoro (Allston Civic Association), Matthew Danish (Livable Streets Alliance), Harry Mattison (Charles River Conservancy), and Robert Sloane (WalkBoston)	Various	12/24/2014
23	Paola M. Ferrer, Galen M. Nook, Rich Parr, Jessica Robertson (residents of Allston), Anthony D'Isidoro (Allston Civic Association), Matthew Danish (Livable Streets Alliance), Harry Mattison (Charles River Conservancy), and Robert Sloane (WalkBoston)	Various	12/26/2014
24	Jeff Cook, Vice President	Fidelity Real Estate Company	12/24/2014
25	George F. Hailer	James G. Grant Co., LLC	12/22/2014
26	Robert L. Beal	Related Beal	12/23/2014
27	Brad Bellows	Brad Bellows Architects	12/24/2014
28	Adam Castiglioni		12/24/2014
29	Frank DeMasi		12/22/2014
30	Honorable Michael S. Dukakis		12/20/2014
31	Steve Hollinger		12/12/2014
32	Coleman Hoyt, President	Acton Chrysler Dodge Jeep Ram	12/1/2014
33	Ned Imbrie		11/18/2014
34	Stephen H. Kaiser		12/24/2014
35	Kenneth J. Krause		12/24/2014
36	Robert J. La Tremouille		12/2/2014
37	Katherine Green Meyer		11/24/2014
38	Gerry Pieri		12/24/2014
39	James RePass, Founder and Chairman	The National Corridors Initiative	12/19/2014
40	Joseph Rogers		12/24/2014
41	Frederick Salvucci		12/24/2014
42	Drew Volpe		12/24/2014

Commonwealth of Massachusetts
Executive Office of Energy & Environmental Affairs

Department of Environmental Protection

Northeast Regional Office • 205B Lowell Street, Wilmington MA 01887 • 978-694-3200

[illegible]

[illegible]

December 24, 2014

Maeve Vallely Bartlett, Secretary
Executive Office of
Energy & Environmental Affairs
100 Cambridge Street
Boston MA, 02114

RE: Boston
South Station Expansion Project
Summer Street and Atlantic Avenue
EEA # 15028

Attn: MEPA Unit

Dear Secretary Bartlett:

The Massachusetts Department of Environmental Protection (MassDEP) has reviewed the Draft Environmental Impact Report (DEIR) submitted by the Massachusetts Department of Transportation (MassDOT) for the expansion of Boston's South Station on 49 acres, in vicinity of the South Station Transportation Center, which includes the South Station Terminal, the South Station Bus Terminal, the U.S. Postal Service facility, and adjacent roadways in Boston (EEA #15028). Three potential layover facilities at Widett Circle, Beacon Park Yard, and Readville-Yard 2 are elements of the project necessary to facilitate the expansion of intercity and high speed rail service.

There are five major project components. Expansion of South Station will increase the number of railroad tracks from 13 to 20 by the year 2035 and platforms from seven to eleven. The tracks and platforms will be reconfigured, including platform lengths, which will meet Amtrak and MBTA berthing standards. The Tower 1 Interlocking will be modified and most of the approach interlocking will be reconfigured to improve efficiencies and reduce conflicts. The existing headhouse will be expanded from 210,000 square feet (sf) to 400,000 sf, and a new headhouse and entrance are planned along Dorchester Avenue.

The second component is the acquisition and demolition of the US Postal Service Facility. Three alternative layover sites at the Widett Circle, the Beacon Park Yard, and Readville - Yard 2 are the third major element of this project. The DEIR indicates that Beacon Park Yard to the west will be used as a layover facility, and a selection of either Widett Circle or Readville - Yard 2 will be made in the FEIR. The reopening of Dorchester Avenue to extend the Harborwalk with the

addition of about an acre of open space, and additional development on adjacent land as well as above the expanded South Station facilities are the final two project components.

An evaluation of three alternatives for comparison with the No Build Alternative has been provided in the DEIR. Alternative 1 includes only transportation improvements, while Alternatives 2 and 3 consider the potential for future public/private development with the transportation at two densities, including a minimal level alternative (660,000 sf and 234 parking spaces) and a maximum level (two million sf and 506 parking spaces), respectively. A preferred expansion alternative will be identified in the FEIR. These development alternatives are being considered in comparison with a baseline project that includes the South Station Air Rights Project (EOEA#3205 and 9131) that included 1.765 million square feet of mixed-use development and a 70,000 sf expanded bus terminal with a 775 space parking garage above the terminal. MassDEP provides the following comments.

Wastewater

The DEIR estimates that the wastewater generated by Alternative 3, the maximum build option would be 750,900 gallons per day (gpd), which would more than double the wastewater generated, increasing flow by 411,900 gpd over the existing 339,000 gpd. The DEIR indicates that the existing 22,720 gpd of wastewater flow eliminated with demolition of the post office would off-set this increase. Since it is unclear whether a deduction in wastewater flow has been taken for the post office, and the increase of the other alternatives are not included, it is requested that the FEIR provide a clear table showing the differences and changes in wastewater flow generation by the proposed project. The table should include the actual existing wastewater flow, the estimated increase in wastewater from the previously approved SSAR project, the wastewater increase for the preferred expansion project alternatives, and the off-set reduction in wastewater flow from the elimination of the post office. These data should be tallied to show the increase in wastewater generated by the preferred alternative for the South Station expansion project. 1.1

As of April 25, 2014, the sewer regulations changed and the requirements for a self-certification or a sewer connection/extension permit from MassDEP were eliminated. Under the terms of the new regulations at 314 CMR 12.04(2)(d), MassDEP requires sewer authorities with permitted combined sewer overflows, including the Boston Water & Sewer Commission, to require removal of four gallons of infiltration and inflow (I/I) for each gallon of new wastewater flows generated for any new connection where greater than 15,000 gallons per day of new wastewater flows will be generated.

According the Draft Section 61 Finding, MassDOT makes a commitment to achieve the I/I removal requirements, and to contacting MassDEP and the Boston Water and Sewer Commission to identify the opportunities to eliminate I/I within the project's sewer service area. The DEIR acknowledges that opportunities beyond the service area, e.g., the North End may be included in the I/I removal because there appear to be insufficient opportunities in the vicinity of the project site.

According the Draft Section 61 Finding, MassDOT makes a commitment to achieve the I/I removal requirements, and to contacting MassDEP and the Boston Water and Sewer Commission to identify the opportunities to eliminate I/I within the project's sewer service area. The DEIR acknowledges that opportunities beyond the service area, e.g., the North End may be included in the I/I removal because there appear to be insufficient opportunities in the vicinity of the project site.

Wetlands

South Station and the proposed Readville - Yard 2 layover facility would impact wetland resources, as explained in the DEIR (Chapter 4 and Appendix 5). The South Station expansion project site footprint is proposed within 129,200 sf of land subject to coastal storm flowage and 346,900 sf of buffer zone to coastal bank. In addition, repairs to the Fort Point Channel seawall are anticipated. The layover facility at the Readville- Yard 2 would impact about 2,100 sf of the Riverfront Area and 14,200 sf of buffer zone to the inland bank of the Neponset River. These impacts will require submittal of Notices of Intent to obtain wetlands Orders of Conditions for the proposed work on previously developed sites within the resource areas.

Stormwater

According to the DEIR, much of the South Station drainage system was constructed in the 1980s, and that the system to be retained, "(w)ould have to be analyzed to confirm acceptability for use with evolving precipitation intensity and frequency data, and rising sea levels." It is requested that the FEIR expand upon this statement (page 5-17), with information that explains the analysis and/or the results of the analysis to understand the modifications and improvements that would be recommended for the stormwater system to function adequately in controlling flooding on and near the site under future sea level rise scenarios. In recognizing that the CSO outfall elevations are lower than the mean higher-high water level of Fort Point Channel (Appendix 7, page 10), and that higher tailwater elevations would be higher, the DEIR identifies a need for tide gates at these CSO outfalls to minimize localized nuisance flooding. However, tidegates and/or other needed improvements are not specifically identified, except for a notation that the condition of the outfalls at Fort Point Channel would be evaluated and addressed in final design, if necessary.

An overview of the existing storm drain systems in the vicinity of South Station, Widett Circle, Beacon Park Yard, and Readville-Yard 2 is included in the DEIR, (Chapter 4 and Appendix 7). The DEIR also identifies the ten combined sewer outfalls discharging drainage from the South Station site. Water quality impairments and total maximum daily loads (TMDLs for the Fort Point Channel and Boston Inner Harbor, the Charles River and Salt Creek, and the Neponset River are described for the watersheds where the project sites are located. Peak rates and volumes of runoff are provided for all sites. In addition, there is general information on the proposed stormwater management systems and compliance with the applicable city, state, and federal requirements.

For compliance with the Stormwater Management Standards in the wetlands regulations, the stormwater systems would be designed to meet the redevelopment standard, which is applicable when a project on a previously developed site requires no net increase in impervious area. A reduction in imperviousness is reported for the alternatives considered at South Station

(Appendix 7, Table 8), and the layover sites, except for Readville-Yard 2, where imperviousness will increase from 10.9 acres to 14.7 acres (Appendix 7, Table 10,12, and 14). Since there will be an increase in imperviousness, the stormwater management system at Readville-Yard 2 would need to be designed for compliance with the new development stormwater management performance standards. The DEIR indicates that BMPs will be included at this location (Appendix 7, page 37) to meet these standards, but at the level of detail provided in the DEIR, this cannot be confirmed.

The FEIR should be clearer about the water quality treatment trains proposed, considering that there are total maximum daily loads established for the waterbodies where stormwater will be discharged, and that catch basins provide only limited water quality treatment. Water quality treatment best management practices are reported to include catch basins and proprietary separators for the South Station site due to site limitations. The DEIR also reveals that runoff from the additional platform, the expanded concourse, the joint development, and Dorchester Avenue would discharge directly to Fort Point Channel (Appendix 7, page 23). In the absence of conceptual stormwater control plans or additional information, it is requested that the FEIR explain why deficiencies in the stormwater management systems would be unavoidable. For compliance with the stormwater management standards, it is necessary to support a claim that stormwater standards in the wetlands regulations at 310 CMR 10.05(6)(k) are met to the maximum extent practicable and improve existing conditions to comply with 310 CMR 10.05(6)(k)7 and 310 CMR 10.05(6)(o)(2). If it can be demonstrated that full compliance cannot be achieved, then it must be clear that the highest practical level of stormwater management is being provided. 1.2 1.3

The train track drainage system at South Station includes a ditch/subdrain that drains to a catch basin and a closed drainage system. Drip pans also capture pollutants from the undercarriage of the train sets, which is conveyed with stormwater to an oil/water separator that is reported to connect to the sewer system (Section 6.2.1 in Appendix 7). It is requested that conceptual plans of this system design be included in the FEIR. In addition, it should be confirmed that the stormwater discharge from this rail track area and all layover facilities is to the sewer system, given that Chapter 4 also indicates that discharges from the oil/water separator would discharge to the storm drain system or the sewer system. 1.4

MassDEP appreciates that consideration is being given to pervious pavers with underdrains for sidewalks and the proposed Harborwalk along Dorchester Avenue. However, the FEIR should make it clear that pavers and infiltration systems will not be used in areas of site contamination, where stormwater runoff would come into contact with significant pollutant sources, as explained for Stormwater Management Standard 3 in the *Stormwater Management Handbook*, (Volume 1, Chapter 1, page 7). 1.5

Sea Level Rise

By the end of this century, global sea level is projected to rise by two feet under a low emissions scenario, and up to about 4 feet[1], under a high emissions scenario, and the

[1] *Third National Climate Assessment*, http://nca2014.globalchange.gov/report . "In recent years, "semi-empirical" methods have been developed to project future rates of sea level rise based on a simple statistical relationship

Massachusetts coastline is among the areas where sea level rise is predicted to be on the higher end of that range. Nuisance flooding, which is becoming a more frequent, high-tide related coastal impact may have potentially damaging effects on the proposed project. In addition, the impacts of sea level rise also will be exacerbated by extreme weather events that are expected to occur with greater frequency and intensity due to climate changes associated with increasing greenhouse gas emissions. Given the vulnerability of the coastline near the proposed project site, MassDOT will need to anticipate the impacts of sea level rise and the potential for damage to the Commonwealth's transportation infrastructure, personal property, and businesses, due to storm surge, flooding, and an eroding shoreline. 1.6

The DEIR has provided some basic information to document the site's vulnerabilities to flooding and sea level rise, but given the importance of the transportation infrastructure, a more in depth assessment may be appropriate to build in a high level of a resiliency. According to the DEIR, the 100-year base flood elevations from the FEMA Flood Insurance Rate Maps (FIRM) 2009 and Preliminary November 15, 2013 (to be effective 2015) were used to evaluate the flooding impacts due to climate change. A two-foot sea level rise[2] was added (Chapter 5). However, a two-foot increase in elevation was identified in both the Secretary's Certificate and the Massachusetts Coastal Zone Management as the minimum that should be considered in the vulnerability analysis. Even at this minimal level, the empirical analysis shows that floodwaters would inundate the entire project site in certain storm events. Portions of the existing project site are within the 100-year flood elevation currently.

Given the uncertainties relating to sea level rise and the increasing frequency of extreme storm events, vulnerability analyses generally cover a range of impacts under several scenarios. Therefore, it may be appropriate to reconsider the project design vulnerabilities to flooding using more conservative sea level rise parameters, particularly to ensure that the critical public transportation facilities will be sufficiently resilient over the life span of the project. At a minimum, it is requested that the FEIR explain the rationale for the sea level rise(s) selected, and how the information will be used, and/or revised during the project design process, to ensure that the mitigation measures and strategies deployed will be adequate to adapt the project to future flooding conditions and minimize impacts. While Table 5-2 identifies mitigation strategies, it should be clearer whether all of these measures will be implemented. As some measures identified could have major impacts and/or indirect impacts on nearby areas, (e.g., floodwater control dike surrounding the site and raising the base elevation of the site), the potential impacts of the mitigation also should be given further consideration. 1.7 1.8

The DEIR has not explained whether the base flood elevations in the vulnerability assessment (i.e., 10-13 feet NAVD 88) are from the Federal Emergency Management Agency (FEMA) Flood Insurance, 2009 Rate Map, the 2013 map, or a combination of both FEMA maps. For consistency with the revised wetlands regulations (October 24, 2014), pursuant to the definition of Special Flood Hazard Area, 310 CMR 10.04, it should be clear that "(t)he best available information, including, but not limited to the currently effective or preliminary Federal Emergency Management Agency (FEMA) Flood Insurance Study or Rate Map (except for any 1.9

between past rates of globally averaged temperature change and sea level rise. These models suggest a range of additional sea level rise from about 2 feet to as much as 6 feet by 2100, depending on emissions scenario."

[2] The DEIR indicates that the Secretary required a two-foot sea level rise in the vulnerability assessment

portion of a preliminary map that is subject of an appeal to FEMA) for Land Subject to Coastal Storm Flowage…." is used in the empirical analysis.

Chapter 91- Waterways Program

The Waterways Program in MassDEP/Boston Office reviewed the Draft EIR for the referenced project and offers the following comments.

Jurisdiction

The DEIR identifies the South Station Expansion project site as being composed of previously authorized filled Commonwealth tidelands, some of which are considered landlocked tidelands in accordance with a legislative act (section 85 of Chapter 235 of the Acts of 2000). As such, the proponent intends to file a license application for review of the changes in use and structural alterations proposed within 250 feet of the mean high water shoreline. The three layover sites are identified as being on either landlocked tidelands (Beacon Park Yard), subject to a Public Benefit Determination, or uplands (Widett Circle and Readville Yard 2).

Alternative Analysis

Section 4.3 of the DEIR identifies the existing conditions of the project site and the potential impacts of the three potential alternative development scenarios for the South Station Development without choosing a preferred alternative. All alternatives are dependent on the US Postal Service relocating to another site to be determined and evaluated independently. According to the analysis, both Alternative 1 (transportation components only) and Alternative 2 (minimum density joint private development) meet the chapter 91 waterways regulatory requirements.

As a Nonwater-dependent Infrastructure Facility, the massing plan for Alternative 1 appears to meet the specific standards applicable to infrastructure projects at 310 CMR 9.55 by providing publicly accessible open space, opening up Dorchester Avenue to vehicular, pedestrian, and bicycle circulation, and establishing a critical link of the HarborWalk with associated landscaping and pedestrian amenities. Clear visual and pedestrian connections should be provided through the project site to connect existing public ways with the waterfront. The Harborwalk should be designed to be consistent with the City of Boston standards. The massing plan for Alternative 2 is identified as meeting the setbacks, site coverage, height, and use restrictions found at 310 CMR 9.51-9.54, which are applicable to other nonwater-dependent use projects. The DEIR recognizes that this project site was within the geographic planning area for the Municipal Harbor Plan for Fort Point/Downtown area but since the City has not completed the planning analysis for the reuse of the US Postal Service site, no substitutions of the waterways regulations apply to this site. As such, the nonwater-dependent mixed use buildings will be expected to fully activate the interior and exterior of the project site including - providing Facilities of Public Accommodation on the entire ground floor with the exception of up to 25 percent of the area needed for Upper Floor Accessory Services; and providing open space equal to the area devoted to nonwater-dependent use buildings. The Alternative 3 massing concept does not meet the waterways regulations and cannot be evaluated until the city completes its MHP process. Since the DEIR presents conceptual alternatives, these following comments should be considered design standards. The MassDEP will be available for pre-application assistance prior to submitting the Final EIR.

Greenhouse Gas Emissions

According to the DEIR, the plan is for the project to meet or exceed the next version of the Stretch Energy Code (SCH), or whatever code is in effect at the time the building permits are filed (Appendix 12, page 15). The project also will be certifiable under the US Building Council's Leadership in Energy and Environmental Design Massachusetts LEED Plus standard.

The results of an analysis of greenhouse gas (GHG) emissions has been provided in Appendix 12 to demonstrate that Alternative 3 with energy efficiencies would have lower GHG emissions consistent with the objectives in the *MEPA Greenhouse Gas Emissions Policy and Protocol*. The direct and indirect stationary source, GHG emissions were modeled using the eQUEST model, version 3.64. The Building Code, 8th edition, which is based on ASHRAE 90.1-2010 was used as the Baseline Case. Compared with the Baseline, the maximum build alternative has been modeled to show a reduction of CO_2 emissions from stationary sources by about 11.8 percent, (a reduction of 898 tons of CO_2 per year (tpy) with a total emissions generation of 6,736 tpy of CO_2) (Table 3). The supporting model data were not found in the DEIR or the Appendices.

The potential GHG emissions impacts associated with water and wastewater also were quantified in the DEIR, in accordance with the *MEPA Greenhouse Gas Emissions Policy and Protocol*. The GHG emissions are estimated at 82 tons per year, which will be minimized by using low-flow and water less plumbing fixtures, as well as minimal irrigation for plantings, consistent with Massachusetts LEED Plus (page 5-4).

As described and identified in Table 1(Appendix 12, page 11), the stationary source GHG emissions reductions are generally attributable to building envelop energy efficiencies with higher performance materials, high efficiency chillers and condensing boilers with VAV and high efficiency recovery (terminal and mixed-use office/retail), fan coils with high efficiency chillers and condensing boilers (hotel and multi-family), daylighting, efficient lighting (20 percent better than code), and occupancy sensors. MassDOT also has made a commitment to develop a tenant manual as a tool to support high performance building fit-outs and energy efficient operations of facilities.

Renewable energy from photovoltaics, solar thermal, and wind, as well as combined heat and power (CHP) was considered in the DEIR. However, the electricity grid serving the project is likely to be through a spot network of vaults that are not suitable for electricity from distributed generation sources. Therefore, the opportunities to incorporate renewable energy sources into the project at this time appear to be limited. In the event that circumstances become more favorable, MassDOT is encouraged to continue to pursue renewable energy during the design process. 1.10

The potential to the Veolia district steam appears to be feasible and the FEIR should explain whether MassDOT will continue to pursue this option. As pointed out in the DEIR, if the steam source is CHP, then there would be a significant GHG emissions reduction potential from using a district steam source. 1.11

Air Quality – Mobile Source

MassDEP recognizes the importance of expanding South Station's rail capacity as necessary to improve commuter rail service to southern and southwestern Massachusetts regions as well as advance regional interstate/city connections. The DEIR addresses three Build alternatives, one providing transportation improvements only, and two joint public/private development programs (Alternatives 2 and 3). The DEIR states that all Build alternatives would: increase rail capacity by adding seven tracks and three platforms to existing South Station, provide for an expanded South Station headhouse in place of the existing USPS facility, and reconstruct Dorchester Avenue, including construction of a cycle track. In addition, Alternatives 2 and 3 could provide approximately 660,000 square feet of private development with approximately 234 parking spaces and up to 2 million square feet of private development with approximately 506 parking spaces, respectively.

The DEIR contains the recommended air quality analyses. The analyses followed MassDEP-approved modeling protocols. Mobile source project-related emissions are generated from a combination of train and bus activity, layover facilities and, most predominantly, vehicle traffic in the study area surrounding South Station. The project-related pollutant emissions for Alternative 1 in both 2025 and 2035 are higher by one to two percent when compared to the project-related emissions for the respective No Build Alternatives. Project-related emissions for Alternative 3 in both 2025 and 2035 are higher by about three percent when compared to the project-related emissions for the respective No Build Alternative. The proponent asserts that since the air quality analyses demonstrated that emissions from the proposed project would not create a new violation of the NAAQS, the project would not increase the frequency or severity of any existing violations, and would not delay the attainment of any NAAQS. Therefore, no mitigation of project-related emissions is required.

MassDEP recognizes the reduced project scale since the ENF review stage, namely in amount of on-site structured parking. The DEIR reports a parking supply reduction of 66 percent and 68 percent for Alternatives 2 and 3, respectively. The DEIR indicates the current proposed parking supply, and management thereof, is more consistent with transit oriented development (TOD) and with parking ratios as confirmed by the Boston Transportation Department (BTD). MassDEP strongly supports the reduction in parking supply as the focus in shifting mode choice for the tenants of the proposed joint development projects. MassDEP recognizes the proponent's commitment to charging market rates, providing electric vehicle charging stations, expanding bike and car share programs on site, and providing other amenities necessary to promote bicycle, pedestrian and transit trips consistent with MassDOT's GreenDOT Policy. However, MassDEP urges the proponent to explore additional measures in order to produce further trip reduction and associated emissions and maximize the significant opportunity for TOD that South Station presents. 1.12

Recommended Mitigation Measures

MassDEP recommends that the FEIR address the following measures for consideration in the proposed Tenant Manual: 1.13

- Offer parking cash-out incentives as opposed to parking discounts to employees whose parking is provided. This strategy by employers/tenants provides employees with an

option for compensation for not utilizing dedicated parking spaces, thus supporting and encouraging employees to seek travel modes other than driving alone to work.

- Offer alternative work schedules to employees as well as staggered work shifts, where appropriate, to reduce peak period traffic volumes.
- Provide direct deposit for employees.
- Provide a guaranteed ride home to those employees who regularly commute by transit, bicycle, or vanpool to the site and who have to leave work in the event of a family emergency or leave work late due to unscheduled overtime.

MassDEP recommends that the FEIR address the following measures

- The proponent shall improve proposed bicycle parking access from Dorchester Avenue by providing long term bicycle accommodations as appropriate for project tenants as well as rail and bus commuters. Bicycle parking should be as proposed, secure, convenient, weather protected, and should also be sufficient to meet existing and expected future demand. 1.14
- The proponent shall work with BTD and Boston Bike officials to design, support, and fund as necessary, enhanced short term bicycle parking near building entrances as well as off-site bicycle infrastructure to improve access to the project site. Such bicycle accommodations shall employ MassDOT Design Guidelines or engineering judgment, as appropriate.

Recommended Construction Period Air Quality Mitigation Measures

MassDEP recognizes the proponent's commitment to ensure all project contractors comply with MassDEP's Diesel Retrofit Program (DRP). As noted in the DEIR, MassDEP developed this program to control emissions from construction equipment by promoting the use of such engine emission controls as oxidation catalysts or particulate filters for diesel engines to the maximum extent practicable. The DEIR commits to compliance with the Massachusetts Anti-Idling regulation (310 CMR 7.11) which prohibits motor vehicles from idling their engines more than five minutes. In addition, the State's Low Sulfur Diesel standards (310 CMR 7.05) must be met. Furthermore, all construction equipment would be required to comply with 310 CMR 7.11(1)(b) which requires that engines idle for no more than five minutes. 1.15

The MassDEP appreciates the opportunity to comment on this proposed project. Please contact Kevin.Brander@state.ma.us , at (978) 694- 3236 for further information on the wastewater issues, Jerome.Grafe@state.ma.us, at (617)292-5708 for mobile source air quality, and Andrea.Langhauser@state.ma.us, at (617) 348-4084 regarding the Chapter 91 Waterways Regulatory Program comments. If you have any general questions regarding these comments, please contact Nancy.Baker@state.ma.us , MEPA Review Coordinator at (978) 694-3338.

Sincerely,

John D. Viola
Deputy Regional Director

cc: Brona Simon, Massachusetts Historical Commission
Ben Lynch, Sharon Weber, Jerome Grafe, Andrea Langhauser, MassDEP-Boston
Rachel Freed, Kevin Brander, Heidi Davis, MassDEP-NERO

CITY OF BOSTON • MASSACHUSETTS

MARTIN J. WALSH
MAYOR

December 15, 2014

Secretary Maeve Vallely Bartlett
Executive Office of Energy and Environmental Affairs
MEPA Office
Attn: Holly Johnson, EEA# 15028
100 Cambridge Street, Suite 900
Boston, MA 02114

Re: South Station Expansion – Draft Environmental Impact Report (DEIR)

Dear Secretary Bartlett,

The City of Boston has been coordinating closely with MassDOT on their South Station Expansion Project. The expansion of capacity at South Station is critical for improved mobility in Eastern Massachusetts and will have a transformative impact on the City and South Station area.

South Station Master Plan & Municipal Harbor Plan Amendment

The City of Boston's Fort Point Downtown Waterfront Municipal Harbor Plan (MHP) includes the United States Postal Service (USPS) property and the adjacent Dorchester Avenue within its planning area. As you know, EOEA issued a decision on Phase II of the plan in March 2004, for the Russia Wharf property (now Atlantic Wharf), which deferred further amendments to the MHP south of Summer Street until the City developed a comprehensive master plan for the area.

The Boston Redevelopment Authority has initiated a master planning process in conjunction with MassDOT and the expansion of South Station, and will file an Amendment to the MHP upon completion of the MHP planning process, which must be approved by the Secretary before the submission of a Final Environmental Impact Report (FEIR).

One of the primary tasks of the master planning and MHP amendment process will include a review of build-out and massing alternatives for the air rights development and an analysis of substitutions to the Chapter 91 Waterways Regulations performance standards and associated

mitigation, or offsets. The DEIR states that no mitigation is anticipated regarding new shadow cast by the DEIR Build Alternatives due to the net benefit to public use of the waterfront that the project would create. It is presumptive to make these qualifications regarding development related impacts and mitigation on Chapter 91 jurisdictional areas. The MHP planning process must first analyze air rights massing alternatives, which may differ from the DEIR Build Alternatives, review associated impacts on the public realm and watersheet, and then make offset recommendations to EOEEA as part of the MHP amendment.

The master plan and MHP Amendment will also function to implement the City's Fort Point Channel Watersheet Activation Plan, developed in 2002 as a resource of waterfront activation, programming and infrastructure enhancements tied to new development along the Channel. The Activation Plan has anticipated the extension of Harborwalk along Dorchester Avenue, as well as the construction of a new pedestrian connection across the Channel.

Regarding Chapter 91 Waterways jurisdiction on the project site, the DEIR references Section 85 of Chapter 235 of the 2000 Acts of the Massachusetts General Court and indicates the Act establishes Landlocked Tidelands on all filled tidelands more than 250 feet from the high water mark of the Fort Point Channel. The Act, however, only states that Chapter 91 licensing is not required for the construction of structures on air rights over an intermodal transportation center, and makes no reference to Landlocked Tidelands. Greater clarity must be provide on the DEIR interpretation as it could have implications regarding the project Public Benefit Determination and MHP Amendment. 2.1

The DEIR makes no reference to water transportation in the document or technical reports. Water transit should be included as a component of any transit and multi modal analysis due to increases in water transit ridership, South Station's proximity to the Fort Point Channel, as well as a new ferry terminal to be constructed by MassDOT in the spring of 2015 at 500 Atlantic Avenue, which is within a five minute walk of the project site. 2.2

Proposed Head House

While we strongly support this project, we believe there is another alternative station design that should also be considered. The proposed conceptual design outlined in the DEIR places the new station head house midway along the length of Dorchester Avenue. We believe this would put the station's "center of gravity" in the wrong location, out of the way of the primary flow of pedestrian and vehicular traffic. We believe the corner of Summer Street and Dorchester Avenue would make a more logical location.

Locating the new station head house at the corner of Summer Street and Dorchester Avenue would be more logical in terms of access and it would also free up more terra firma land along Dorchester Avenue for joint development. By allowing a greater amount of development on terra firma, we believe more joint development could occur earlier owing to improved financial feasibility. Other flaws of the proposed station concept design as outlined in the DEIR are: a) that it locates the head house and retail on an upper deck, requiring that passengers move up and

down, rather than staying at ground level; and b) it assumes a large and potentially expensive structure would have to be built above the tracks.

The BRA recently conducted a preliminary analysis of the economically feasibility of a station design that assumes that the head house would be located on the ground level of a new building at 245 Summer Street. This feasibility analysis revealed that following goals could be achieved by this alternative design:

- Maximize ground level station space;
- Create viable locations for retail;
- Maximize terra firma for joint development;
- Maintain a 100 foot right of way on Dorchester Avenue; and,
- Create a financially feasible alternative that recoups the market value of 245 Summer Street as well as the value of the proposed high build joint development scenario outlined in the DEIR;

For all the reasons stated above, we strongly urge that an analysis of an alternative design locating the station head house at the corner of Summer Street and Dorchester Avenue be incorporated into the final environmental analysis. 2.3

Track Design

The City of Boston recommends that due to the complexities of air-rights development, it is crucial that the new tracks and platforms incorporate as many structural support elements as possible to ensure the success of future development. MassDOT should also take into consideration the long envisioned utilization of the region's rail corridors by diesel multiple units (DMUs), and in particular should consider any track improvements to accommodate DMU service for the Fairmont Line and, for the "Track 61" corridor which would provide serve to the South Boston Waterfront. 2.4 2.5

Climate Impacts

The Sustainable Design and Climate Change Adaptation section of the DEIR represent the project site as being highly susceptible to inundation from future sea level rise and extreme storm events. MassDOT's Boston Harbor Flood Risk Model should be utilized to better assess the vulnerability of the site, future development and transportation infrastructure to inundation and to evaluate the most effective adaptive measures. The proponent should also coordinate with the New York City Metropolitan Transportation Authority and review applicable storm resilient design and operational measures they have implement since hurricane Sandy in 2012. 2.6 2.7

The project should consider unpredictable climate related events as a key component for the new station design. Predicted incremental changes in sea level rise as well as increased frequency of extreme weather events will impact components of our city's rail system. It is for this reason, as

well as the station's location next to the harbor, that a range of well-established current extreme weather standards and risk management policies should be in place and considered in the design. Major impacts to rail functions can include: 2.8

- Sea level rises and storm surge increase requiring improved railway flood defenses
- Increased harbor and localized flooding leading to washouts and flooding of bridges, embankments, culvert washout, depot flooding and track and lineside equipment failure;
- An increase in the number of days required to monitor track buckling and an increase in the frequency of speed restrictions as a result;
- A reduction in productivity for maintenance workers, due to heat stress;
- A small projected increase in sag of overhead line equipment;
- An increase of passenger heat stress;

We ask that the design account for projected sea level rise and storm surge and recommends a design that provides as much barrier to the train tracks from the waters' edge as possible. Barriers to the waters' edge will enable much needed time for services to maintain shuttling people out of the downtown core in an evacuation scenario. The design should consider emerging/ alternative technologies to reduce heat and flood risks as well as green landscaping along the waterfront edge and surrounding the site in its sidewalks and landscaping. A resilient plan of design for the sea-wall abutting this project should also be discussed as part of long-term resilience plans. 2.9 2.10

The rail network closely co-operates with other interdependent transport and city entities. The site should be planned for considering an evacuation scenario- taking into account customer expectations and how the building layout will aid this process. The building should be designed to enable greater asset management, communications, technical support for operations, planning and delivering maintenance, and delivery of renewals. This plan for the site should address: large-scale temporary absence of staff, permanent or long-term loss of staff, denial of site, loss of mains electricity, disruption of transport, loss of mains water and sewerage, loss of availability of oil and fuel, and loss of fixed line/mobile communications. 2.11 2.12

New Connections

The reopening of Dorchester Avenue in conjunction with this project will provide both a crucial new connection for access to the station, and serve as an important connection between South Boston and downtown. We commend MassDOT for their collaborative efforts in working with the City on the conceptual design for this multimodal roadway. The proposed concept in addition to providing an important vehicular connection, will also provide a generous 2-way cycle track and a new segment of the Harborwalk network. We request that MassDOT consider opening the street for at least pedestrian and bicycle access as soon as possible following the relocation of the USPS. 2.13

As the long-term vision for the 100 Acres area in the Fort Point neighborhood is being realized, combined with an expanded Convention Center, there will be ever increasing demand for access to South Station from this portion of South Boston. The recent analysis from the ongoing South

Boston Waterfront Sustainable Transportation Plan shows that some of the heaviest pedestrian volumes flow from South Station over the Summer Street Bridge and down A Street. With the South Station Expansion project providing access from a reopened Dorchester Avenue, the need for a new pedestrian bridge over the Fort Point Channel south of Summer Street (as has been envisioned in both the Seaport Public Realm Plan and the 100 Acres Master Plan), will be further in demand. We are requesting that MassDOT fund the full design process for this crucial link as a part of their mitigation package. 2.14

Proposed Roadway Operational and Pedestrian Access Improvements

The MassDOT team has worked collaboratively with the City in developing curbside operational improvements to Atlantic Avenue. We are requesting that these low cost improvements be done as soon as possible by MassDOT as they would have immediate benefits to the current accessibility of South Station. 2.15

We are also are supportive of the proposed intersection and pedestrian access improvement concepts that MassDOT has developed with City staff. We feel the seven intersection improvements committed to for the "transportation only" alternative need to be implemented prior to the start of construction for the expansion work, as this will help mitigate the construction period impacts on traffic and pedestrian access. 2.16

We ask that a premier mobility-hub complete with a state of the art bike cage, electric vehicle charging, bike/car-sharing, transit/shuttle link arrival/departure time options be included in the design in prominent locations for efficient transfer and mobility choice. 2.17

Layover Facilities

The City has serious concerns over the proposed Widett Circle layover site. Currently this location provides an easily accessible home for many food processing businesses which is a unique part of the City's economy that would be difficult to relocate to a comparable location within the city.

In the longer term, this area is one of the largest remaining locations for growth and economic development that is essentially in the heart of the city with excellent transportation access. The Mayor recently announced that the adjacent Dorchester Avenue corridor from Broadway to Andrew Stations will be a "strategic planning area", where we will be focusing our efforts in the coming year, and the long term vision for this adjacent geography will further enhance the longer term importance of the Widett Circle area.

We ask that MassDOT continue to work with the city to both reexamine previously evaluated sites as well as consider other new locations for south side mid-day layover. At the same time, the design approach for Widett site should be refined to allow for longer term development that could be accommodated over the layover facility. 2.18 2.19

Thank you for the opportunity to comment on this significant project. For further details please contact Jim Fitzgerald, BRA at 617.918.4327 or Rachel Szakmary, BTD at 617.635.2755.

Sincerely,

Kairos Shen
Director of Planning
Boston Redevelopment Authority

Vineet Gupta
Director of Policy & Planning
Boston Transportation Department

The Commonwealth of Massachusetts
William Francis Galvin, Secretary of the Commonwealth
Massachusetts Historical Commission

December 23, 2014

Michelle W. Fishburne
Environmental Protection Specialist
Office of Railroad Policy and Development
USDOT Federal Railroad Administration
1200 New Jersey Avenue, SE
Washington, DC 20590

RE: South Station Expansion Project, Summer Street & Atlantic Avenue, Boston (Downtown), MA;
MHC # RC.53253. EEA# 15028.

Dear Ms. Fishburne:

The Massachusetts Historical Commission (MHC), office of the Massachusetts State Historic Preservation Officer, has reviewed the Draft Environmental Impact Report (DEIR), received November 5, 2014 for the project referenced above.

The MHC looks forward to receipt of additional information, including the Final Environmental Impact Report (FEIR) that should contain scaled existing and proposed conditions project plans for the preferred alternative, and to the Federal Railroad Administration's (FRA) determinations of effects for the preferred project alternative in compliance with Section 106 of the National Historic Preservation Act (36 CFR 800). 3.1

The DEIR indicates that the proposed project alternatives will be coordinated with other contiguous project environmental reviews, including the South Station Air Rights project (EEA# 3205/9131; MHC# RC.9138) and the I-90 Allston Interchange Project (MHC# RC. 57197), for incorporation into evaluation of preferred project alternatives in the vicinity of the South Station Head House as noted in Chapter 1 and the Beacon Park Yard layover area. Proposed conceptual designs for new construction and/or modification to the South Station Head House should be submitted to the MHC for review and comment as they are developed. 3.2

The DEIR (Section 4.12) includes evaluations of potential visual, atmospheric, and physical effects, through the introduction of new shadows and wind, construction methods and demolition of the USPS General Mail Facility/South Postal Annex on historic properties, including the South Station Head House (BOS.1517), Fort Point Channel Historic District (BOS.CX), 245 Summer Street (BOS.2050), and the Leather District (BOS.AP). It is the opinion of MHC staff that the USPS General Mail Facility/South Postal Annex (MHC # BOS. 1694) does not meet the criteria of eligibility for listing in the National Register of Historic Places (36 CFR 60) pursuant to the 1983 evaluation completed by the USPS. The FEIR should include a matrix of effects for National Register-Listed or National Register-eligible historic architectural resources within the preferred alternative area of potential effect. 3.3

220 Morrissey Boulevard, Boston, Massachusetts 02125
(617) 727-8470 • Fax: (617) 727-5128
www.sec.state.ma.us/mhc

The MHC looks forward to continued consultation with the FRA, MassDOT, and the MBTA, and as project planning proceeds.

These comments are offered to assist in compliance with Section 106 of the National Historic Preservation Act of 1966 (36 CFR 800), M.G.L. Chapter 9, Sections 26-27C (950 CMR 71.00) and MEPA (301 CMR 11). Please contact Jonathan K. Patton or Elizabeth Sherva of my staff if you have any questions.

Sincerely,

Brona Simon

Brona Simon
State Historic Preservation Officer
Executive Director
State Archaeologist
Massachusetts Historical Commission

xc: Mary Beth Mello, Federal Transit Administration
Matthew Ciborowski, MassDOT
Andrew Brennan, MBTA
Secretary Maeve Vallely Bartlett, EEA, ATTN: Holly Johnson, MEPA Unit
Boston Landmarks Commission
Boston Preservation Alliance
Joe Bagley, Boston City Archaeologist
Deborah C. Cox, PAL, Attn: Suzanne Cherau

Boston Water and Sewer Commission
980 Harrison Avenue
Boston, MA 02119
617-989-7000
Fax: 617-989-7718

December 24, 2014

Secretary Maeve Vallely Bartlett
Executive Office of Energy and Environmental Affairs
Attn: MEPA Office
Holly Johnson, EEA No. 15028
100 Cambridge Street, Suite 900
Boston, MA 02114

Re: South Station Expansion Project –
Draft Environmental Impact Report

Dear Secretary Bartlett:

The Boston Water and Sewer Commission (Commission) has reviewed the Draft Environmental Impact Report (DEIR) for the South Station Expansion Project (SSX). The SSX project includes five primary elements: the expansion of the South Station terminal facilities, the acquisition and demolishment of the US Postal Service General Mail Facility, the extension of the Harborwalk along the reopened Dorchester Avenue, the future development of the site by private/public partnerships and the development of areas beyond the South Station site for rail vehicle layover.

The Commission submitted comments on the MassDOT's Environmental Notification Form for this project in 2013. A number of those comments submitted have been addressed in the DEIR but several issues will need to be resolved when the size of the project is better understood.

The DEIR presents four alternatives showing various levels of development by private/public

partnerships. The levels begin with demolishing the Postal Service Facility to expand the number of tracks and end with an extensive development over the expanded tracks. The most extensive development scenario will increase the wastewater generated from the South Station site by 122 % from 338,950 gallons per day (gpd) to 750,900 gpd, under Alternative 3.

The Commission owns and maintains water, sewer and stormwater facilities within and abutting the South Station site. The MassDOT is responsible for assessing the whether the existing water and sewer lines have adequate capacity to serve the proposed South Station site for whichever development scenario is selected. 4.1

In addition to developing the South Station site, MassDOT proposes to develop rail vehicle layover areas at: Widett Circle, Beacon Park Yard and Readville – Yard 2. The Commission has concerns about how stormwater will be managed at these sites as well as at the South Station site. The comments related to the layover areas are at the end of this letter.

Currently, most of the stormwater from the South Station site discharges into the Commission's CSO outfall, BOS 065, which in turn discharges to Fort Point Channel. The South Station site is located very close to Fort Point Channel; only a section of Dorchester Avenue and the Harborwalk separate it from this receiving water. Reopening of Dorchester Avenue and the extending the Harborwalk present an opportunity to improve how stormwater is managed in the future. The Commission believes that MassDOT should investigate the development of a drainage system dedicated for the South Station site. 4.2
This dedicated system could provide the project with a system capable of withstanding the higher water levels in Fort Point Channel anticipated in the future. The Commission would also benefit from this system. The capacity of the BOS 065 outfall could be preserved for areas located further away from Fort Point Channel

All of the alternatives for South Station presented in the DEIR propose to substantially increase wastewater flows. In April 2014, the Massachusetts Department of Environmental Protection (DEP) promulgated new regulations which affect agencies responsible for operating collection systems containing combined sewers. The Commission, which possesses a National Pollutant Discharge Elimination System (NPDES) Permit for its combined sewer overflows, is subject to section 12.04(2)(d) of the recent changes to 314 CMR 12.00. The section quoted above requires that all new sewer connections exceeding 15,000 gallons per day mitigate the impacts of the development by removing four gallons of infiltration for each gallon of new wastewater.

The Commission will require MassDOT to participate in the 4 to 1 infiltration reduction program. The proponent will need to commit to participating in this program 90 days before the water service for the project is activated. 4.3

Stormwater discharges from the proposed layover areas

Widett Circle: The MassDOT proposes to create a layover area that would occupy most of Widett Circle. The Commission's Dorchester Brook Conduit abuts this area and provides the means for stormwater to discharge into Fort Point Channel at BOS 070. The proponent will need to contact the Commission to determine how the site can be connected to this conduit. 4.4

In addition, depending upon the SIC Code assigned to the activity on this site, MassDOT may be required to submit a Notice of Intent and a Stormwater Pollution Prevention Plan to the US Environmental Protection Agency. The Commission requests to be copied if these documents are submitted for any of the layover areas or the South Station site. 4.5

Beacon Park Yard: The MassDOT proposes to direct stormwater from this site into the Commission's storm drain that conveys stormwater and flows from the Smelt Brook into the Charles River. The Beacon Park Yard abuts another MassDOT project, the I 90 Interchange which appears to have its own stormwater collection system. The Commission requests that the proponent direct stormwater from Beacon Park Yard to the MassDOT storm drainage system that will be developed for the I-90 Interchange.

Readville – Yard 2: The Readville – Yard 2 site is located along the Neponset River. The MassDOT proposes to direct stormwater from this site to the Commission's 54-inch storm drain which discharges to the Neponset River. The Commission requests that the MassDOT develop a storm drainage system that discharges directly to the Neponset River rather than connecting to the existing system. BWSC_6

Thank you for this opportunity to comment on the South Station Expansion Project.

Yours truly,

John P. Sullivan, P.E.
Chief Engineer

JPS/pwk

c
Frank Depaola, MassDOT
Ronald D. Schlesinger, USPS
M. Zlody, Boston Environment
C. Jewell, BWSC
P. Larocque, BWSC

MASSACHUSETTS WATER RESOURCES AUTHORITY
Charlestown Navy Yard
100 First Avenue, Building 39
Boston, MA 02129

Frederick A. Laskey
Executive Director

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

December 23, 2014

Maeve Vallely Bartlett, Secretary
Executive Office of Energy and Environmental Affairs
100 Cambridge St, Suite 900
Attn: MEPA Office, Holly Johnson
Boston, MA 02114

Subject: EOEEA #15028 - Draft Environmental Impact Report,
South Station Expansion Project, Boston, MA

Dear Secretary Bartlett:

The Massachusetts Water Resources Authority (MWRA) appreciates the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the proposed South Station Expansion (SSX) Project (Project) submitted by the Massachusetts Department of Transportation (MassDOT). The purpose of the 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. A horizon year of 2035 and an approximate opening year of 2025 are used for analysis of the project.

The project consists of these primary components: expanding South Station to accommodate additional platforms, tracks, a new expanded (by 400,000 square feet) headhouse, and passenger amenities, acquiring and demolishing the United States Postal Service facility, constructing rail layover facilities, reopening Dorchester Avenue and extending the Harborwalk. The DEIR evaluates three potential layover facility sites, located at Widett Circle in South Boston, Beacon Park Yard in Allston, and Yard 2 in Readville. The Massachusetts Department of Transportation has not determined the preferred alternative for all project components.

MWRA's comments continue to focus specifically 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 Flows

The Water and Wastewater Technical Report ("WWTR") that accompanies the DEIR describes the existing and proposed wastewater systems in the Project area, existing and proposed wastewater flows, proposed wastewater collection and management plans, and mitigation measures.