5.4. Response to Comments on the DEIR

This section provides responses to each comment identified in the comment letters included in Section 5.3, DEIR Comment Letters. For those comments that are addressed directly in the text of the FEIR, a section reference is provided. For those comments that are not addressed directly in the text of the FEIR, a response is provided within Table 5-2, Response to Comments. Comments have been transcribed exactly as found in the comment letters, complete with any erroneous spelling or other matter that might otherwise be taken as an error of transcription.

Table 5-2 — Response to Comments

Letter No.	Comment No.	Author	Comment	Response
0	C.01	MEPA	The FEIR should include a detailed description of the project and describe any changes to the project since the filing of the DEIR.	FEIR Sections 1.3, Summary of Project Changes since the DEIR, and 1.2, The Project, include a detailed description of the project and changes to the project since the filing of the DEIR.
0	C.02	MEPA	The FEIR should include updated site plans, if applicable, for existing and post-development conditions at a legible scale (80-scale or larger) for the South Station site, Widett Circle and Readville – Yard 2. These conceptual plans should include not only on-site work, but any proposed off-site work associated with transportation improvements. The FEIR should include plans at a legible scale clearly depicting each interlocking (Interlocking 1, Cove and Broad) that will be modified as part of SSX. These graphics should depict existing conditions at each interlocking, environmental or property ownership constraints that may influence their final design, and proposed modifications to trackwork.	FEIR Appendix D, *Track Configuration Alternatives Analysis – Tier 2 Screening Technical Report*, includes the requested graphics.
0	C.03	MEPA	The FEIR should discuss how the preferred interlocking design will eliminate or reduce delays in a scenario where a locomotive	FEIR Section 3.8.2, Terminal Track Configuration Alternatives Analysis, discusses the benefits of modified interlocking designs.

Letter No.	Comment No.	Author	Comment	Response
			becomes disabled within its trackwork.	
0	C.04	MEPA	If updated ridership projections are available, the FEIR should summarize these changes and discuss how they may affect the overall project. The FEIR should address comments regarding the perceived discrepancy between increases in track layout capacity and future ridership projections.	Updated projections for South Station ridership have not been performed and hence are not available. FEIR Section 3.8.3, Track Layout Capacity and Future Ridership and Appendix F, *Transportation Documentation*, address the relationship between increases in track layout capacity and future ridership projections.
0	C.05	MEPA	It is unclear how the project design may be impacted if SSAR does not proceed prior to construction of SSX. The FEIR should include a discussion of how platform lengths, headhouse and concourse circulation and access from the surrounding neighborhood may be altered and how this may affect final project design.	FEIR Section 1.5.3, Update on the South Station Air Rights Project, provides this information.
0	C.06	MEPA	…the environmental impacts associated with the BPY layover facility will be reviewed in conjunction with the I-90 Allston Interchange project (EEA # 15278). The FEIR should include an update on the status of this project's funding, design, and MEPA review.	FEIR Section 1.5.4, I-90 Allston Interchange Project/Beacon Park Yard, provides this information.
0	C.07	MEPA	If the I-90 Allston Interchange project does not advance in a timely manner and MassDOT wishes to commence use of BPY in a manner beyond that specifically authorized in its agreement with Harvard University, a Notice of Project Change (NPC) may be required for the SSX project.	Comment noted.

Letter No.	Comment No.	Author	Comment	Response
0	C.08	MEPA	The FEIR should include an updated discussion of permitting requirements associated with the project and how the project will be constructed in accordance with applicable regulatory performance standards.	FEIR Section 1.6, Anticipated Permits and Approvals, includes a discussion of permitting requirements and compliance with applicable regulatory performance standards.
0	C.09	MEPA	The FEIR must include a selection of a Preferred Alternative. This Preferred Alternative should include both South Station improvements (i.e., platforms and track layout, interlocking upgrades, conceptual headhouse design, Dorchester Avenue improvements, and bicycle, pedestrian and intersection improvements) and selected layover facility locations.	FEIR Section 1.2, The Project, and Chapter 2, Project Design Updates, Cost, Funding, and Schedule, describe the preferred alternative ("the project") in detail.
0	C.10	MEPA	The FEIR should include the results of the Tier 2 terminal track configurations screening alternatives.	FEIR Section 3.8.2, Terminal Track Configuration Alternatives Analysis, and Appendix D, *Track Configuration Alternatives Analysis – Tier 2 Screening Technical Report*, discusses the results of the Tier 2 alternatives analysis.
0	C.11	MEPA	The FEIR should describe each modeled alternative, how it will meet Amtrak and the MBTA's future service plans, meet project OTP and delay goals, and allow parallel moves between Tower 1 Interlocking and the terminal.	FEIR Section 3.8.2, Terminal Track Configuration Alternatives Analysis, Appendix D, *Track Configuration Alternatives Analysis - Tier 2 Screening Technical Report*, and Appendix E, *Railroad Operations Analysis Technical Report*, discuss future service plans, on-time performance (OTP) and delay goals, and parallel moves.
0	C.12	MEPA	These alternatives should be evaluated based on their impacts to existing infrastructure, construction staging, capital and maintenance costs, and operations with respect to accommodating and coordinating	FEIR Section 3.8.2, Terminal Track Configuration Alternatives Analysis, and Appendix D, *Track Configuration Alternatives Analysis - Tier 2 Screening Technical Report,* discuss evaluation measures.

Letter No.	Comment No.	Author	Comment	Response
			with other SSX project elements, including the station and midday layover facilities, and the SSAR project.	
0	C.13	MEPA	The FEIR should clarify how freight operations were incorporated into the evaluation of future service plans and access to and from the layover facilities.	FEIR Appendix E, *Railroad Operations Analysis Technical Report*, describes how operating windows for existing freight service within the project study area, as it operates today, were included in the operations analysis. These operating windows for freight service were not adversely impacted by the modeled future year passenger rail service plans.
0	C.14	MEPA	The FEIR should also include an assessment of platform capabilities and berthing abilities, including the number of platforms accessible to each track. The FEIR should note if platforms will not meet established MBTA and Amtrak requirements for longer trainsets. If these standards cannot be met, the FEIR should identify which tracks and platforms will be affected and how this may impact future operations and service capabilities.	FEIR Section 3.8.2, Terminal Track Configuration Alternatives Analysis, and Appendix D, *Track Configuration Alternatives Analysis – Tier 2 Screening Technical Report*, discusses platform berthing.
0	C.15	MEPA	MassDOT should provide an additional analysis of innovation mechanisms to extend platform lengths. The FEIR should identify which tracks/platforms may implement these techniques and estimated extension lengths. Selection of these techniques should be coordinated with project stakeholders, the FRA, Amtrak and the MBTA.	FEIR Section 3.8.2, Terminal Track Configuration Alternatives Analysis, and Appendix D, *Track Configuration Alternatives Analysis – Tier 2 Screening Technical Report*, discusses platform lengths.
0	C.16	MEPA	The FEIR should include a preferred South Station design alternative. The FEIR should	FEIR Section 1.2, The Project, describes the preferred South Station design alternative ("the project").

Letter No.	Comment No.	Author	Comment	Response
			describe how the conceptual design is consistent with MassDOT's station design principles, project purpose and need, and established performance objectives. The FEIR should also present a preferred joint/private development alternative, based upon ongoing financial and real estate feasibility analyses.	FEIR Section 2.2, Consistency with Project Goals and Objectives, addresses project purpose and need, and established performance objectives. Section 2.1.4, Consistency with Updated Station Design Principles, discusses the application of design principles.
0	C.17	MEPA	The FEIR should include an expanded assessment of preferred layover facility operations based upon various combinations and capacities at Widett Circle, BPY, and Readville – Yard 2 to support the selection of a Preferred Alternative that meets the project's layover needs.	FEIR Section 3.8.4, Preferred Layover Facility Operations Assessment, provides this information.
0	C.18	MEPA	The FEIR should specifically address how the location and operations at any of the potential layover facility sites will impact Main Line services for Amtrak, the MBTA and freight services due to necessary train deadheading and midday storage requirements.	FEIR Section 3.8.5, Layover Location and Operations Impacts on Rail Services, and Appendix E, *Railroad Operations Analysis Technical Report*, describe the operations analysis conducted for the SSX project, which includes both revenue and non-revenue train trips,[1] and their impacts to commuter rail service along each south side line.
0	C.19	MEPA	The FEIR should also clearly identify proposed maintenance or other rail-related operations that will be undertaken at each layover yard. These activities, and their potential environmental impacts (e.g., industrial wastewater generation, noise impacts), should be accurately reflected in the environmental analyses prepared by MassDOT. The FEIR should clarify [if]	FEIR Section 3.8.6, Activities at Layover Facilities, and Appendix E, *Railroad Operations Analysis Technical Report*, detail the functions of the proposed layover facilities, which were assumed in the DEIR.

[1] Non-revenue is a railroad industry term used to describe the movement of equipment and/or crews between locations when trains are not in revenue service (such as to and from layover).

Letter No.	Comment No.	Author	Comment	Response
			these activities were assumed in the DEIR, and if not, revise analyses accordingly in the FEIR.	
0	C.20	MEPA	The FEIR should include a phasing plan that addresses sequencing and timing of the potential layover facility sites based on operational need. This analysis should consider what available storage capabilities are presently afforded, or could be implemented in a No Build Alternative, to MassDOT at these facilities, noting that use of the layover facility at BPY is subject to an agreement with Harvard University.	FEIR Section 3.8.7, Layover Phasing Plan, describes a phasing plan for layover facility construction.
0	C.21	MEPA	MassDOT, in a collaborative effort with the City of Boston, should expand its public outreach specifically to [the residents surrounding the Readville – Yard 2 layover facility] prior to selection of a Preferred Alternative.	FEIR Section 1.5.1, Update on Public Outreach Activities, describes MassDOT's expanded public outreach to residents and businesses surrounding the Readville – Yard 2 layover facility.
0	C.22	MEPA	…[T]he FEIR should include an update on outreach efforts to property owners and potentially displaced business owner at Widett Circle.	FEIR Section 1.5.1, Update on Public Outreach Activities, includes an update on outreach efforts to business owners at Widett Circle.
0	C.23	MEPA	As part of the FEIR, I encourage MassDOT to consider additional ways to reduce impacts to environmental resources through design modification or the addition of features to further mitigate potential impacts.	FEIR Section 4.3, Project Mitigation, discusses how impacts will continue to be minimized to the greatest extent practicable.
0	C.24	MEPA	The FEIR should discuss steps MassDOT has taken to further reduce the impacts of the project since the filing of the DEIR, or if certain measures are infeasible, the FEIR should discuss why	FEIR Section 4.3, Project Mitigation, provides this information.

Letter No.	Comment No.	Author	Comment	Response
			these measures will not be adopted.	
0	C.25	MEPA	The FEIR should describe the interrelationship of the Preferred Alternative with the SSAR project.	FEIR Section 1.5.3, Update on the South Station Air Rights Project, provides this information.
0	C.26	MEPA	…the FEIR should provide additional analysis of how proposed platform lengths, column placement, passenger waiting areas, and passenger access points are reliant on either action to be undertaken by SSAR or MassDOT and discuss contingencies in MassDOT's Preferred Alternative design if SSAR does not proceed prior to the SSX project.	FEIR Section 1.5.3, Update on the South Station Air Rights Project, provides this information.
0	C.27	MEPA	The FEIR should identify the extent of proposed land takings associated with the project at Widett Circle and Readville – Yard 2. The FEIR should characterize the existing conditions on these properties and demonstrate that takings have been limited to the extent practicable given MassDOT's proposed programming needs.	FEIR Section 3.3, Land Use and Property, discusses proposed land acquisitions.
0	C.28	MEPA	The FEIR should discuss MassDOT's legal and regulatory obligations associated with private property takings and describe how MassDOT intends to meet these requirements going forward with the Preferred Alternative.	FEIR Section 3.3.4, MassDOT's Legal and Regulatory Obligations, addresses these issues.
0	C.29	MEPA	The FEIR should identify the extent and location of known easements, particularly those associated with water and sewer infrastructure, within the SSX project area, clarify how these	FEIR Section 3.3, Land Use and Property, discusses known easements.

Letter No.	Comment No.	Author	Comment	Response
			easements may impact project construction and operations, and ensure ongoing access to these utilities by the MWRA and/or BWSC for maintenance.	
0	C.30	MEPA	MassDOT should reevaluate the feasibility of additional intersection mitigation measures to further reduce the number of intersections in the study area that currently, or in the future, operate at LOS E and F. If additional mitigation is not proposed, the FEIR should discuss why mitigation measures are infeasible.	FEIR Section 3.9.2, Intersection Mitigation Feasibility Analysis, provides this information.
0	C.31	MEPA	The FEIR should update proposed TDM measures, traffic-related elements of the proposed CMP, or other relevant traffic mitigation measures as necessary to reflect final design elements of the Preferred Alternative.	FEIR Section 3.9.3, Transportation Demand Management Commitments, and Appendix G, *Construction Management Plan*, updates proposed TDM measures and traffic-related elements of the proposed CMP, respectively.
0	C.32	MEPA	The FEIR should provide additional data supporting the assumption that approximately 30% to 40% of South Station-bound traffic trips will be diverted to a reopened Dorchester Avenue in the Build Alternatives.	FEIR Section 3.9.5, Trip Diversion to Dorchester Avenue, discusses this issue.
0	C.33	MEPA	The FEIR should include graphics identifying proposed routes to and from South Station from key roadways and locations such as South Boston, I-93 north, I-93 south, and the MassPike.	FEIR Chapter 2, Project Design Updates, Cost, Funding, and Schedule, includes Figure 3-18, which depicts the distribution of motor vehicle trips to and from South Station.

Letter No.	Comment No.	Author	Comment	Response
0	C.34	MEPA	The FEIR should also include conceptual plans at a legible scale for any proposed transportation improvements that clearly identify lane widths, expanded areas of pavement or removal of medians/open space, traffic signals, pedestrian, bicycle, and transit accommodations. This information is necessary to confirm that adequate area is available to ensure the viability of proposed infrastructure improvements and transportation mitigation measures.	FEIR Chapter 1, Introduction and Project Summary, includes Figure 1-7, which depicts the concept plan for Dorchester Avenue. Chapter 3, Environmental Analyses, includes Figure 3-17, which depicts traffic mitigation measures at the South Station site.
0	C.35	MEPA	The FEIR should include detailed conceptual plans for Dorchester Avenue that clearly indicate the location of and describe available curbside capacity for taxi cabs, MBTA buses, shuttle services, and passenger vehicle drop-off and pick-up.	FEIR Chapter 1, Introduction and Project Summary, includes Figure 1-7, which depicts the concept plan for Dorchester Avenue.
0	C.36	MEPA	The FEIR should discuss how curbside drop-off/pick-up areas will be accessed and designed to avoid conflict with bus operations, pedestrians and bicyclists.	FEIR Section 3.9.6, Curbside Drop-Off/Pick-Up Area Design, provides this information.
0	C.37	MEPA	The FEIR should describe how a reopened Dorchester Avenue may be used to reroute MBTA buses to provide more direct bus connections to downtown.	FEIR Section 3.9.7, Use of Dorchester Avenue by MBTA Buses, provides this information.
0	C.38	MEPA	The FEIR should demonstrate that the preferred South Station design will mitigate existing or potential areas of congestion and poor pedestrian LOS, including projected pedestrian congestion on at-grade rail platforms, within the rail head concourse, and connections to the Silver Line	FEIR Section 2.1.1, Update on South Station Headhouse Design, describes how the preferred design will mitigate areas of pedestrian congestion.

Letter No.	Comment No.	Author	Comment	Response
			and Red Line platforms in the Build Alternatives.	
0	C.39	MEPA	…the FEIR should discuss the current planning (State and federal) and funding status for the NSRL and provide additional detail on how the Preferred Alternative will be designed to ensure that its future construction is not precluded. This discussion should include how platform, concourse, headhouse and circulatory routes may be incorporated into potential future access to additional subterranean tracks, or at a minimum, will not preclude construction of future tunnels and support structures.	As stated in FEIR Section 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. The SSX project 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, which may be associated with the North/South Rail Link project.
0	C.40	MEPA	MassDOT should continue to refine pedestrian and bicycle connection plans between South Station and adjacent streets, the Harborwalk, and through and around South Station to the adjacent neighborhoods (i.e., Fort Point Channel, Seaport District, South Boston, Chinatown, Leather District, etc.). The FEIR should clearly identify these routes and accommodations (e.g., bicycle lanes) and note how the design of the South Station headhouse will enhance these connections.	FEIR Section 3.9.8, Pedestrian and Bicycle Connections, describes the project's enhancements to pedestrian and bicycle connections and facilities.
0	C.41	MEPA	The FEIR should provide additional detail on the conceptual sizing and location of the proposed long-term and short-term bicycle parking, including the anticipated number of bicycle parking spaces based upon mode-share data for South Station.	FEIR Section 3.9.9, Bicycle Parking, provides this information.

Letter No.	Comment No.	Author	Comment	Response
0	C.42	MEPA	The FEIR should clarify elements of the proposed monitoring program, including the types of data to be evaluated, frequency of monitoring, steps to provide further mitigation if anticipated operations and mode share splits are not achieved, and distribution of the reports….I recommend that MassDOT commit to conducting a monitoring program for all Build Alternatives (Alternatives 1, 2, and 3).	FEIR Section 3.9.4, Traffic Monitoring, provides this information.
0	C.43	MEPA	The FEIR should identify the location and type of wetlands resource areas on the South Station and layover facility sites, delineated in accordance with the WPA and describe how the project will be constructed in accordance with applicable wetland resource area performance standards.	FEIR Section 3.4, Wetlands, discusses the location and type of all jurisdictional wetlands.
0	C.44	MEPA	The FEIR should clarify the jurisdiction of the potential isolated vegetated wetland on the Readville – Yard 2 site. If alteration of this wetland requires a 401 WQC, [it] should discuss how MassDOT will meet the 401 WQC regulations and any applicable performance standards.	FEIR Section 3.4, Wetlands, provides this information.
0	C.45	MEPA	The FEIR should discuss the outcomes of the master planning process required in the MHP Phase 2 Decision and the subsequent anticipated MHP Amendment….	The Preferred Alternative is in compliance with Chapter 91 regulations and therefore does not require an amendment to the MHP.

Letter No.	Comment No.	Author	Comment	Response
0	C.46	MEPA	The FEIR should include conceptual design plans, graphics and a supporting narrative for the Preferred Alternative that details the location of uses within the building on tidelands and facilities dedicated for public use consistent with c.91 regulatory requirements and/or the MHP Amendment….	FEIR Section 3.5.2, Chapter 91 Licensing Criteria, describes the regulatory requirements for nonwater-dependent structures. In addition, the Preferred Alternative is in compliance with Chapter 91 regulations and therefore does not require an amendment to the MHP.
0	C.47	MEPA	The FEIR should include an updated discussion demonstrating how the South Station site will be designed to meet the c.91 licensing criteria for a nonwater-dependent (transportation improvements, joint/private development) and water-dependent (Harborwalk extension) uses.	FEIR Section 3.5, Chapter 91 Waterways and Tidelands, provides this information.
0	C.48	MEPA	…[D]uring the MHP Amendment process, a shadow analysis should be completed using the full envelope of possible Alternative 3 build out. …	The Preferred Alternative is in compliance with Chapter 91 regulations and therefore does not require an amendment to the MHP.
0	C.49	MEPA	The FEIR should discuss the feasibility of extending water taxi service to South Station. … The FEIR should discuss how this determination may impact potential water transportation access to the South Station site.	FEIR Section 3.9.11, Water Transportation, discusses the project's approach to water transportation access.
0	C.50	MEPA	The FEIR should include an updated discussion of how the project complies with the Public Benefit Determination (301 CMR 13.00) criteria established for non-water-dependent projects located completely or partially within tidelands or landlocked tidelands based upon the selection of Preferred Alternative for the project (South Station site	FEIR Section 3.5.3, Assessment of Public Benefits, provides an updated discussion regarding the project's compliance with the Public Benefit Determination criteria.

Letter No.	Comment No.	Author	Comment	Response
			and Widett Circle). ... Specifically, the FEIR should include a discussion of: the purpose and effect of the project, impact of the project on abutters and the surrounding community, enhancement to the property, benefits to the public trust rights in tidelands, benefits provided through previously obtained municipal permits, community activities on the South Station site, environmental protection and preservation, and public health, safety, and general welfare.	
0	C.51	MEPA	The FEIR should include a complete stormwater report, with supporting data and graphics, for the South Station and layover facility sites. This analysis should demonstrate compliance with MassDEP's SMS, as applicable and the guidance presented in the MassDEP comment letter regarding compliance with the redevelopment standards.	Appendix A, *Stormwater Analysis Technical Report*, includes plans for the South Station site and the two layover facility sites. All project sites will be designed to comply with the MassDEP Stormwater Management Standards.
0	C.52	MEPA	MassDOT should gather necessary on-site soils and hydrology data to demonstrate the feasibility of surface or subsurface stormwater management best management practices (BMPs). If feasible, the FEIR should incorporate these BMPs into the stormwater management system design.	FEIR Section 3.6, Water Quality and Stormwater, and FEIR Appendix A, *Stormwater Analysis Technical Report,* discusses preliminary soil information and hydrology. Conceptual BMPs were designed based on this information.
0	C.53	MEPA	The FEIR should clarify which proposed BMPs will specifically be implemented within the project to meet the total maximum daily load (TMDL) and Land Uses of Higher Potential Pollutant Load	Section 3.6, Water Quality and Stormwater, and Appendix A, *Stormwater Analysis Technical Report*, describe BMPs that will be implemented to meet TMDL and LUHPPL requirements, as well as conceptual BMP designs.

Letter No.	Comment No.	Author	Comment	Response
			(LUHPPL) requirements. The stormwater management report should include conceptual BMP designs.	
0	C.54	MEPA	If climate change adaptation and resiliency measures include designing the stormwater management system to accommodate more frequent and intense storm events, the FEIR should explain how this measure was accounted for in the stormwater management report.	FEIR Section 3.10.4, Stormwater Management Adaptation and Resiliency Measures, describes the data used to design the stormwater system.
0	C.55	MEPA	The FEIR should include improved graphics at a legible scale identifying the location of project area stormwater infrastructure (i.e., pipes, easements and outfall locations) and CSO connection locations.	FEIR Chapter 3, Environmental Analyses, includes Figure 3-6, Existing Stormwater Infrastructure - South Station, which depicts stormwater infrastructure and CSO connection locations.
0	C.56	MEPA	The FEIR should describe the condition of the stormwater and CSO pipes and outfalls to Fort Point Channel to ensure the feasibility of their use in conjunction with the project.	FEIR Section 3.6, Water Quality and Stormwater, includes information regarding the condition of the stormwater and CSO outfall pipes.
0	C.57	MEPA	MassDOT should work with the BWSC to assess the feasibility and potential stormwater management benefit of constructing a dedicated drainage system for the South Station and Readville – Yard 2 sites. MassDOT should present the results of this analysis in the FEIR.	FEIR Section 3.6.5, Potential Dedicated Drainage Systems, describes the dedicated drainage systems planned for the South Station and Readville – Yard 2 sites.
0	C.58	MEPA	The FEIR should report on the outcome of soil investigations undertaken to determine the infiltration capabilities and overall suitability of the existing	FEIR Section 3.6.3, Soil Conditions and Infiltration Capacity, describes the outcome of soil investigations and the suitability of existing soils for the implementation of surface stormwater BMPs.

Letter No.	Comment No.	Author	Comment	Response
			soils for the implementation of surface stormwater BMPs.	
0	C.59	MEPA	The FEIR should also evaluate the current condition of the 54-inch drainage pipe at Readville – Yard 2 and discuss whether it will be relocated in conjunction with the layover facility expansion. Related proposed conditions plans should reflect this infrastructure change, if applicable.	FEIR Section 3.6.6, Readville – Yard 2 Storm Drain Condition, discusses the drainage pipes at that location.
0	C.60	MEPA	The FEIR should include an additional evaluation of the feasibility of surface or subsurface detention, retention, and/or filtration systems at the Readville – Yard 2 layover site.	FEIR Section 3.6.3, Soil Conditions and Infiltration Capacity, describes the outcome of soil investigations and the suitability of existing soils for the implementation of surface stormwater BMPs.
0	C.61	MEPA	The FEIR should include an assessment of the existing drainage system outfalls to Fort Point Channel to confirm their feasibility for reuse as part of the project, conceivably under a different set of conditions than their original design (e.g., elevated tail water or storms with greater precipitation frequencies).	FEIR Section 3.6.2, Existing Drainage and Combined Sewer Systems, assesses the existing outfalls to Fort Point Channel.
0	C.62	MEPA	The FEIR should discuss how climate change and storm adaptation and resiliency measures will be selected and implemented, either as part of the original project design, or within the design life of the project, with a clear commitment to implementation by MassDOT... *[see MEPA scope for greater detail]*	FEIR Section 3.10, Climate Change, discusses the selection and implementation of adaptation and resiliency measures.
0	C.63	MEPA	If the proponent is considering raising the base level of the site, MassDOT should study the potential flooding impacts to	While the base level of the site will not be raised, the project does include a proposal to raise a section of the seawall along Dorchester

Letter No.	Comment No.	Author	Comment	Response
			adjacent sites and identify these potential impacts in the FEIR.	Avenue. The impact of this action is described in FEIR Section 3.10.1, Vulnerability Assessment Comparison.
0	C.64	MEPA	The FEIR should include a sensitivity analysis comparing the results of this vulnerability assessment and its associated model, the Boston Harbor Flood Risk Model, with that presented in the DEIR to determine if the extent of potential flooding during the evaluated scenarios encompasses a larger than anticipated area.	FEIR Section 3.10, Climate Change, discusses the results of the Boston Harbor Flood Risk Model.
0	C.65	MEPA	The FEIR should provide additional data on the potential depths of inundation within the SSX project area in the 100-year, 100-year plus two feet of sea level rise, and hurricane modeled events.	FEIR Section 3.10, Climate Change, discusses potential inundation levels with two feet of sea level rise and hurricane modeled events.
0	C.66	MEPA	The FEIR should include a table further clarifying existing and proposed project-related wastewater flows, including those that may currently be attributable to the USPS facility and those identified as part of the SSAR project.	FEIR Section 3.7, Water Use and Wastewater, includes a table further clarifying the existing and proposed wastewater generations at the South Station site.
0	C.67	MEPA	The FEIR should demonstrate that any proposed changes to the physical configuration, location, and/or hydraulic performance of sewers and outfalls will not affect compliance with Federal Court mandates and regulatory requirements.	FEIR Section 3.7, Water Use and Wastewater, includes findings from a preliminary investigation of the sanitary sewer and outfall capacity.

Letter No.	Comment No.	Author	Comment	Response
0	C.68	MEPA	The DEIR identified potential impacts from sea level rise and coastal storms to CSOs and MWRA facilities indicating that three CSO outlets to Fort Point Channel near the South Station site may require additional mitigation measures to minimize seawater entering back into the CSO lines. The FEIR should describe in further detail the nature, potential scope, and location of these impacts and identify potential mitigation measures and the anticipated responsible party.	FEIR Section 3.10.5, Mitigating the Impact of Sea Level Rise on Combined Sewer Overflows, addresses these issues.
0	C.69	MEPA	The FEIR should clarify potential water use and wastewater generation at the proposed layover facilities based upon operational programming (e.g., car washing).	FEIR Section 3.7, Water Use and Wastewater, includes a tables and a clarifying statement explaining wastewater generation.
0	C.70	MEPA	The FEIR should identify any additional permitting requirements if industrial wastewater discharges are proposed as part of the project and discuss BMPs that could be implemented to reduce water use and wastewater discharges (e.g., use of recycled wash water).	FEIR Section 3.8.6, Activities at Layover Facilities, indicate that the project does not include industrial waste discharges.
0	C.71	MEPA	The FEIR should clarify if the air quality analysis conducted in the DEIR considered the potential concentration of air pollutants within the platform and track area at South Station subsequent to the construction of Build Alternatives 2 or 3. If this analysis did not evaluate this condition, the FEIR should include supplemental analyses of criteria pollutants, UFPs and DPM in the Build Condition.	FEIR Section 3.11.2, Concentration of Air Pollutants, addresses this comment.

Letter No.	Comment No.	Author	Comment	Response
0	C.72	MEPA	The FEIR should discuss how the preferred station design and South Station platform and track layout will not alter the anticipated noise and vibration characteristics of the site modeled in the DEIR. If the Preferred Alternative will alter these modeling results, the FEIR should include an updated noise and vibration analysis conducted in accordance with FRA and MassDEP requirements to ensure that appropriate mitigation measures are provided.	FEIR Section 3.12.2, Modeled Noise and Vibration Characteristics, explains that the results of the noise modeling analysis remain unchanged from the DEIR.
0	C.73	MEPA	Conceptual plans in the FEIR should indicate the location, type and elevation of proposed noise barriers within the SSX project areas.	FEIR Section 3.12.3, Potential Mitigation Measures, provides this information. These noise barriers are depicted in Figures 3-25 and 3-26.
0	C.74	MEPA	The FEIR should identify how station design elements will provide noise mitigation in interior spaces.	FEIR Section 3.12.1, Impact Summary, addresses noise mitigation in interior spaces.
0	C.75	MEPA	The FEIR should discuss whether MassDOT will implement noise and operational BMPs equal to or more stringent than those currently utilized at other layover facilities along the commuter rail. MassDOT should confirm that a forum for citizen complaint will be implemented as a BMP in the operational plan for any proposed layover facilities and at South Station. The FEIR should identify these proposed BMPs and note any contractual obligations associated with the operator of the MBTA's commuter rail.	FEIR Section 3.12.4, Noise and Vibration Operational Best Management Practices, provides this information.
0	C.76	MEPA	The FEIR should include a feasibility assessment of potential mitigation measures, a phasing	FEIR Section 4.3, Project Mitigation, addresses this issue.

Letter No.	Comment No.	Author	Comment	Response
			plan for their implementation, and identification of responsible parties for their construction and maintenance.	
0	C.77	MEPA	The FEIR should include a clear and complete listing of modeling inputs (e.g., R-values, U-values, efficiencies, lighting power density, etc.) for items such as equipment, walls, ceilings, windows, lighting, HV AC units, etc. that were modeled in the Baseline Case and Build with Mitigation Case to allow for an easier comparison with Building Code requirements.	FEIR Section 3.13.2, Building Energy Modeling Details, includes a table of the requested modeling inputs.
0	C.78	MEPA	The FEIR should clarify the calculated total energy use estimates for the Joint/Private Development projects. *[see MEPA scope for greater detail]*	The Joint/Private Development alternative was not selected, and is not analyzed in this FEIR.
0	C.79	MEPA	The DEIR noted that the preliminary project design did not include modifications to, or ventilation connection with, the existing South Station facilities. The FEIR should confirm if the preferred station design maintains this separation. *[see MEPA scope for greater detail]*	FEIR Section 2.1.3, Ventilation System Configuration, provides this information.
0	C.80	MEPA	The FEIR should include additional analysis of technical and economic feasibility of the following potential renewable energy sources: Veolia steam network connections, including the use of steam to power absorption chillers; Solar PV or solar hot water (SHW) installations; and On-site CHP, including CHP-serving absorption chillers. *[see MEPA scope for greater detail]*	FEIR Section 3.13.3, Feasibility of Veolia Steam Use; Section 3.13.4, Feasibility of Solar Photovoltaic Installation; Section 3.13.5, Feasibility of Solar Hot Water Installation; and Section 3.13.6, On-Site Combined Heat and Power, provide this information.

Letter No.	Comment No.	Author	Comment	Response
0	C.81	MEPA	The FEIR should include at a minimum a commitment to construct buildings to be "solar ready" to facilitate future installation of PV systems. If PV is not financially feasible, I request that MassDOT commit to revisit the PV financial analysis on a regular timetable and to implement PV when the financial outcomes meet specified objectives.	Section 3.13.4, Feasibility of Solar Photovoltaic Installation, provides this information.
0	C.82	MEPA	The FEIR should include an updated draft tenant manual to reflect the elements of the Preferred Alternative, the recommendations from MassDEP (if feasible), and any potential modifications to the proposed ownership and/or tenant leasing structure.	The draft tenant manual included in the DEIR provided guidelines to encourage tenants to minimize energy use in the Joint/Private Development alternatives. The Joint/Private Development alternatives were not selected, therefore an updated draft tenant manual is not included in this FEIR.
0	C.83	MEPA	The mobile source emissions analysis should be revised to account for indirect electrical use associated with the proposed plug-in facilities at South Station and the layover sites. *[see MEPA scope for greater detail]*	FEIR Section 3.13.7, Effect of Locomotive Plug-Ins, provides this information.
0	C.84	MEPA	The FEIR should clarify which standards MassDOT must adhere to in the final design process and those which are merely informational. The FEIR should clarify how the project intends to meet these standards given, in some cases, the outdated benchmarks (e.g., ASHRAE 90.1-2004 for LEED Plus) compared to current Massachusetts Stretch Code standards.	FEIR Section 3.13.9, Applicable Energy Codes, Standards, and Rating Systems, provides this information.

Letter No.	Comment No.	Author	Comment	Response
0	C.85	MEPA	The FEIR should also clarify which sustainable infrastructure rating system MassDOT intends to adopt to ensure the project design meets targeted sustainability goals.	FEIR Section 3.13.9, Applicable Energy Codes, Standards, and Rating Systems, provides this information.
0	C.86	MEPA	The FEIR should describe how the preferred station design will mitigate potential impacts to historic resources. *[see MEPA scope for greater detail]*	FEIR Section 3.14, Historic Resources, provides this information.
0	C.87	MEPA	The FEIR should provide an update on the Section 106 review process and identify proposed mitigation measures for impacts to historic architectural resources.	FEIR Section 1.5.2, Update on the Section 106 Review Process, and Section 3.14, Historic Resources, provide this information.
0	C.88	MEPA	Interim correspondence and project renderings between the FRA, MHC and/or City historic review authorities should be provided as an appendix for reference.	There has been no correspondence among FRA, MassDOT, MHC, and BLC since MHC's letter to FRA, dated December 23, 2014.
0	C.89	MEPA	If any Recognized Environmental Conditions (RECs) are identified [during the Phase 1 ESAs], the FEIR should include a draft site-specific health and safety plan (SSHASP).	FEIR Appendix C, *Hazardous Materials Documentation*, includes draft SSHASPs.
0	C.90	MEPA	MassDOT should conduct any Phase II ESA's identified subsequent to the Phase I ESA process and present the results as part of the FEIR.	FEIR Section 3.15, Site Contamination and Hazardous Materials, notes that Phase II ESAs were not conducted due to lack of site access.
0	C.91	MEPA	If a Phase II is required, the FEIR should identify the components of a draft soil and groundwater sampling and analysis program to ensure compliance with the MCP and inform the selection of mitigation measures proposed in	FEIR Section 3.15, Site Contamination and Hazardous Materials, notes that Phase II ESAs were not conducted due to lack of site access.

Letter No.	Comment No.	Author	Comment	Response
			conjunction with the project or the construction process.	
0	C.92	MEPA	The FEIR should specifically discuss how MCP-regulated conditions may impact construction techniques (i.e., dewatering, foundation types, etc.) or potential site infrastructure (e.g., groundwater and stormwater management) in the Preferred Alternative.	FEIR Section 3.15.3, Impacts on Construction Techniques, provides this information.
0	C.93	MEPA	The FEIR should discuss the potential implications of the Activity and Use Limitation (AUL) on the Readville – Yard 2 site. The FEIR should identify the responsible party, plans for remediation, and how compliance with the MCP may impact layover facility design or the construction timeline.	FEIR Section 3.15.4, Implications of the Activity and Use Limitation at Readville – Yard 2, provides this information.
0	C.94	MEPA	The FEIR should include an evaluation and description of potential construction period access locations and laydown areas for station, rail and layover facilities…. The FEIR should also describe how Amtrak, MBTA commuter rail and light rail, bus, and freight service will be modified and accommodated during project construction ... *[see MEPA scope for greater detail]*	FEIR Section 3.16, Construction Impacts, and Appendix G, *Construction Management Plan*, discuss access and accommodations during construction.
0	C.95	MEPA	I strongly encourage MassDOT to commit to monitoring noise and vibration levels after service starts (with the proposed mitigation in place) to evaluate whether actual noise and vibration levels correspond with the modeled values.	FEIR Section 3.12.5, Noise and Vibration Monitoring, discusses this issue.

Letter No.	Comment No.	Author	Comment	Response
0	C.96	MEPA	MassDOT should indicate how appropriate corrective actions may be determined and implemented if actual [noise] values are found to be higher than the projections.	FEIR Section 3.12.5, Noise and Vibration Monitoring, discusses this issue.
0	C.97	MEPA	The FEIR should include a revised draft CMP, as necessary, to reflect the elements of the Preferred Alternative. *[see MEPA scope for greater detail]*	FEIR Appendix G, *Construction Management Plan,* provides a revised draft CMP.
0	C.98	MEPA	The FEIR should include a separate chapter summarizing proposed mitigation measures. This chapter should also include draft Section 61 Findings for each State Agency that will issue permits for the project.	FEIR Chapter 4, Proposed Section 61 Findings and Mitigation, provides this information.
0	C.99	MEPA	The FEIR should contain clear commitments to implement mitigation measures, estimate the individual costs of each proposed measure, identify the parties responsible for implementation, and contain a schedule for implementation. *[see MEPA scope for greater detail]*	FEIR Chapter 4, Proposed Section 61 Findings and Mitigation, provides this information.
0	C.100	MEPA	The project includes a variety of public-realm infrastructure improvements. The FEIR should include a conceptual long-range maintenance plan for these public-realm improvements, including identification of responsible parties, to ensure adequate upkeep of these project-related improvements. If a long-term maintenance plan structure is unknown, the FEIR should include a commitment by the MassDOT to work with the City and neighborhood associations to establish a plan.	FEIR Section 3.9.10, Maintenance of Public Realm Infrastructure, addresses this issue.

Letter No.	Comment No.	Author	Comment	Response
0	C.101	MEPA	I require proponents to provide a self-certification to the MEPA Office indicating that all of the required mitigation measures, or their equivalent, have been completed. … The commitment to provide this self-certification in the manner outlined above should be incorporated into the draft Section 61 Findings included in the FEIR.	FEIR Section 4.2, Proposed Draft Section 61 Finding, provides this information.
1	1	MassDEP NERO	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.	FEIR Section 3.7, Water Use and Wastewater, includes a table clarifying the existing and proposed wastewater generations at the South Station site.
1	2	MassDEP NERO	The FEIR should be clearer about the water quality treatment trains proposed, considering that there are TMDL established for the waterbodies where stormwater	FEIR Appendix A, *Stormwater Analysis Technical Report*, includes a detailed explanation of proposed water quality treatment and how the TMDLs are being addressed.

Letter No.	Comment No.	Author	Comment	Response
			will be discharged, and that catch basins provide only limited water quality treatment.	
1	3	MassDEP NERO	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. 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. 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)(0)(2).	FEIR Section 3.6, Water Quality and Stormwater, and Appendix A, *Stormwater Analysis Technical Report*, discuss stormwater management.
1	4	MassDEP NERO	It is requested that conceptual plans of [the ditch/subdrain & drip pan] 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.	FEIR Section 3.6, Water Quality and Stormwater, includes a clarifying statement noting that all stormwater discharge from the rail track area and from all layover facilities is to the sanitary sewer system. Conceptual plans of the ditch/subdrain and drip plans are in the preliminary stages and are not available for inclusion in the FEIR at this time.
1	5	MassDEP NERO	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	FEIR Appendix A, *Stormwater Analysis Technical Report*, states that where infiltration would not be appropriate on contaminated sites, it would be restricted.

Letter No.	Comment No.	Author	Comment	Response
			and infiltration systems will not be used in areas of site contamination, where stormwater runoff would come into contact with significant pollutant sources.	
1	6	MassDEP NERO	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.	FEIR Section 3.10.1, Vulnerability Assessment Comparison, includes an analysis of the impacts of projected sea level rise.
1	7	MassDEP NERO	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.	FEIR Section 3.10.1, Vulnerability Assessment Comparison, includes an analysis of projected sea level rise using the Boston Harbor Flood Risk Model. As part of the ENF Certificate, MEPA and CZM s recommended that MassDOT evaluate the impacts of a potential sea level rise scenario of two feet.
1	8	MassDEP NERO	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 [flooding] mitigation also	MassDOT recognizes the potential impacts to abutting properties from certain floodwater control mechanisms and will address these issues as strategies are developed.

Letter No.	Comment No.	Author	Comment	Response
			should be given further consideration.	
1	9	MassDEP NERO	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 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.	FEIR Section 3.10.1, Vulnerability Assessment Comparison, clarifies which FEMA maps were used in the DEIR vulnerability analysis, and provides additional analysis based on the March 16, 2016 Flood Insurance Rate Maps (FIRMs).
1	10	MassDEP NERO	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.	FEIR Section 3.13, Greenhouse Gas Emissions, reviews the feasibility of the use of solar PV, solar hot water, and onsite CHP.
1	11	MassDEP NERO	The potential to the Veolia district steam appears to be feasible and the FEIR should explain whether MassDOT will continue to pursue this option.	FEIR Section 3.13.3, Feasibility of Veolia Steam Use, provides this information.

Letter No.	Comment No.	Author	Comment	Response
1	12	MassDEP NERO	MassDEP recognizes the proponent's commitment to charging market rates, providing electric vehicle charging stations, expanding bicycle 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.	The project does not include joint development, no longer proposes 242 parking spaces at the site, and substantially improves non-auto accommodations (transit, pedestrian, bus, and bicycle). As discussed in FEIR Section 3.9.8, Pedestrian and Bicycle Connections, and Section 3.9.9, Bicycle Parking, the proposed cycle track, along the reopened segment of Dorchester Avenue, would connect with existing bicycle infrastructure and complement future plans by the City. Existing Hubway bicycle sharing stations would complement the new cycle track and plans for bicycle parking within the expanded headhouse. In addition, as described in FEIR Section 3.9.2, Intersection Mitigation Feasibility Analysis, and Section 3.9.3, Transportation Demand Management Commitments, MassDOT has committed to making several intersection improvements and will implement Traffic Demand Management activities that will further reduce trip generation and associated emissions.

Letter No.	Comment No.	Author	Comment	Response
1	13	MassDEP NERO	MassDEP recommends that the FEIR address the following measures for consideration in the proposed Tenant Manual: • 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.	The draft tenant manual included in the DEIR provided guidelines to encourage tenants to minimize energy use in the Joint/Private Development alternatives. The Joint/Private Development alternatives were not selected for further evaluation, therefore an updated draft tenant manual is not included in this FEIR.
1	14	MassDEP NERO	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; The proponent shall work with BTD and Boston Bike officials to design, support, and fund as	FEIR Section 3.9.9, Bicycle Parking, provides this information. Details on the bicycle parking element of the project will be refined throughout the engineering design phase of the project. For example, the approximate size and location of proposed bicycle parking and curbside space allocation will be determined as the designs for the headhouse and Dorchester Avenue are finalized. As part of the design approvals for Dorchester Avenue, the location and size of any new Hubway stations would be vetted with the City of Boston. Similarly, MassDOT will identify elements of the

Letter No.	Comment No.	Author	Comment	Response
			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.	Construction Management Plan to minimize disruption to transit users, pedestrians, bicyclists, and drivers in the area throughout construction.
1	15	MassDEP NERO	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 (I)(b) which requires that engines idle for no more than five minutes.	As discussed in DEIR Section 6.4.2, Emissions Control Plan, MassDOT will require that the State's Low Sulfur Diesel standards (310 CMR 7.05) will be met for all diesel-powered equipment accessing the sites. As stated in the DEIR, MassDOT will require that all construction equipment will be required to comply with 310 CMR 7.11 (I)(b) which requires that engines idle for no more than five minutes.
2	1	City of Boston	The [2000 Acts of the Massachusetts General Court] 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 provided on the DEIR interpretation as it could have implications regarding the project Public Benefit Determination and MHP Amendment.	The Preferred Alternative is in compliance with Chapter 91 regulations and therefore does not require an amendment to the MHP.
2	2	City of Boston	Water transit should be included as a component of any transit and multi modal analysis.	FEIR Section 3.9.11, Water Transportation, addresses this issue.
2	3	City of Boston	We strongly urge that an analysis of an alternative design locating	Comment noted.

Letter No.	Comment No.	Author	Comment	Response
			the station headhouse at the corner of Summer Street and Dorchester Avenue be incorporated into the final environmental analysis.	
2	4	City of Boston	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.	Comment noted.
2	5	City of Boston	[MassDOT] should consider any track improvements to accommodate DMU service for the Fairmount Line and for the "Track 61" corridor.	The Commonwealth of Massachusetts does not currently have formal plans to implement new rail technology on the MBTA's commuter rail system. However, should the Commonwealth contemplate implementing this type of technology into the system in the future, the SSX project would not preclude these services and would be compatible with the use of new technologies within the expanded terminal area.
2	6	City of Boston	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.	FEIR Section 3.10.1, Vulnerability Assessment Comparison, incorporates the Boston Harbor Flood Risk Model into the sea level rise impact analysis.
2	7	City of Boston	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.	MassDOT will continue to draw from the experience of numerous past projects in the development of the SSX project.
2	8	City of Boston	A range of well-established current extreme weather standards and risk management	FEIR Section 3.10, Climate Change, discusses some of the extreme weather standards that will guide the

Letter No.	Comment No.	Author	Comment	Response
			policies should be in place and considered in the design [of the new station].	design. Further policies will be developed as the design advances.
2	9	City of Boston	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.	FEIR Section 3.10, Climate Change, addresses sea level rise and storm surge.
2	10	City of Boston	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.	FEIR Sections 3.10.2 through 3.10.5 discuss opportunities to mitigate the risks associated with climate change.
2	11	City of Boston	The site should be planned for considering an evacuation scenario, taking into account customer expectations and how the building layout will aid this process.	FEIR Section 2.1.1, Update on South Station Headhouse Design, discusses the safety parameters guiding the layout of the station.
2	12	City of Boston	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.	Comment noted.

Letter No.	Comment No.	Author	Comment	Response
2	13	City of Boston	We request that MassDOT consider opening [Dorchester Avenue] for at least pedestrian and bicycle access as soon as possible following the relocation of the USPS.	Comment noted.
2	14	City of Boston	We are requesting that MassDOT fund the full design process for [a new pedestrian bridge over the Fort Point Channel], a crucial link, as a part of their mitigation package.	Under Chapter 91, as a nonwater-dependent infrastructure facility the project is exempt from the regulatory standards at 310 CMR 9.51 (Conservation of Capacity for Water-Dependent Use), 310 CMR 9.52 (Utilization of Shoreline for Water-Dependent Purposes), and 310 CMR 9.53 (Activation of Commonwealth Tidelands for Public Use). Because joint development is no longer included in the project, additional public benefits related to waterfront access are not required. An updated discussion regarding the project's compliance with the Public Benefit Determination criteria is included in Section 3.5.3 of the FEIR.
2	15	City of Boston	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.	Comment noted.
2	16	City of Boston	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.	The sequencing of mitigation will be formalized as part of the CMP for the project.

Letter No.	Comment No.	Author	Comment	Response
2	17	City of Boston	We ask that a premier mobility-hub complete with a state of the art bicycle cage, electric vehicle charging, bicycle/car-sharing, transit/shuttle link arrival/departure time options be included in the design in prominent locations for efficient transfer and mobility choice.	Comment noted.
2	18	City of Boston	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 midday layover.	During the layover alternatives analysis, MassDOT, in coordination with the City, identified any reasonable site that satisfied the evaluation criteria necessary to adequately support railroad operations at South Station. From this detailed evaluation, Beacon Park Yard, Widett Circle, and expanded Readville – Yard 2 sites were selected as preferred locations for south side midday layover facilities. Beacon Park Yard is being evaluated as part of the I-90 Allston Interchange project. MassDOT and the City will continue to discuss what future opportunities are at the Widett Circle site.
2	19	City of Boston	The design approach for Widett site should be refined to allow for longer term development that could be accommodated over the layover facility.	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 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, which are outside the scope of this project. As any City efforts advance, MassDOT will continue to coordinate with the City to help realize a future development vision for Widett Circle.

Letter No.	Comment No.	Author	Comment	Response
3	1	Massachusetts Historical Commission	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).	FEIR Chapter 1, Introduction and Project Summary, includes project plans. Section 3.14.2, Preliminary Determinations of Effect, provides a preliminary determination of effect, developed by MassDOT to assist in consultation with MHC in accordance with State Register Review procedures. FEIR Section 1.5.2, Update on the Section 106 Review Process, discusses the Section 106/NEPA review process.
3	2	Massachusetts Historical Commission	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.	FEIR Chapter 1, Introduction and Project Summary, includes conceptual design plans. Project plans will be submitted to the MHC at the 30% and 60% design phases for review, to confirm the design is consistent with established design principles and historic preservation standards for new construction.
3	3	Massachusetts Historical Commission	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.	FEIR Section 3.14.2, Preliminary Determinations of Effect, includes a matrix of effects for National Register-listed and eligible historic properties.
4	1	Boston Water and Sewer Commission	The MassDOT is responsible for assessing whether the existing water and sewer lines have adequate capacity to serve the proposed South Station site for whichever development scenario is selected.	MassDOT will continue coordination with BWSC to obtain all existing system information that is available to assess the existing condition and determine the impact of the project on the sewer system.
4	2	Boston Water and Sewer Commission	MassDOT should investigate the development of a drainage system dedicated for the South Station site. This dedicated system could provide the project with a system capable of withstanding the higher water	MassDOT will continue coordination with BWSC to obtain all existing system information that is available to assess the existing condition and determine the impact of the project on the sewer system.

Letter No.	Comment No.	Author	Comment	Response
			levels in Fort Point Channel anticipated in the future.	
4	3	Boston Water and Sewer Commission	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.	MassDOT will continue coordination with BWSC as the design process moves forward.
4	4	Boston Water and Sewer Commission	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.	MassDOT has requested Dorchester Brook information from BWSC on November 20, 2015 and will continue to investigate connections to this conduit.
4	5	Boston Water and Sewer Commission	Depending upon the Standard Industrial Classification (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 U.S. 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.	FEIR Section 1.6, Anticipated Permits and Approvals, lists the federal, state, and local agency permits and approvals that are anticipated for the project. MassDOT will submit all required documentation based on the project's future design needs.
4	6	Boston Water and Sewer Commission	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	FEIR Section 3.6.6, Readville – Yard 2 Storm Drain Condition, discusses the drainage pipes at that location. MassDOT met with BWSC on November 17, 2015 to discuss early coordination items including potential outfall locations. Follow-up meetings will occur as the project design progresses.

Letter No.	Comment No.	Author	Comment	Response
			rather than connecting to the existing system.	
5	1	Massachusetts Water Resources Authority	On page 2 of the Appendix 8, Water and Wastewater Technical Report (WWTR), the Proponent reports in the Boston Water & Sewer Commission's (BWSC) assessment that there is adequate capacity in its sewer mains to collect and convey the project's new wastewater flows, which could increase wastewater flow contribution from the site by as much as 453,150 gallons per day (gpd) at the South Station site, an increase of 122% from existing conditions, according to the WWTR. This may be true for dry weather flow conditions, but downstream BWSC and MWRA sewer systems serving South Station and the other project areas can surcharge and overflow during large storms, due to large volumes of stormwater entering combined sewer systems. Any increase in sanitary flow, if not offset with infiltration/inflow ("I/I") or stormwater removal from hydraulically related sewer systems, can be expected to worsen system surcharging and overflows.	FEIR Section 3.7, Water Use and Wastewater, includes a table clarifying the existing, proposed and mitigated wastewater generation at the South Station site.
5	2	Massachusetts Water Resources Authority	It is imperative that the Proponent evaluate 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. Connections to the BWSC sewer pipes should be carefully selected to ensure that any local sewer surcharging is not worsened by the new flows in a	FEIR Section 3.7.2, Impacts to Existing CSOs, addresses this issue.

Letter No.	Comment No.	Author	Comment	Response
			way that causes greater CSO discharges at nearby CSO regulators and outfalls, notwithstanding the removal of extraneous flows elsewhere.	
5	3	Massachusetts Water Resources Authority	If groundwater is encountered during the construction activities, an MWRA Temporary Construction Site Dewatering Discharge Permit will be required pursuant to 360 C.M.R. 10.091-10.094. For assistance in obtaining this permit, both the Proponent and the Contractor (the individual that will conduct the construction) should contact Stephen Buczko, Industrial Coordinator within the TRAC Department at (617) 305-5619.	MassDOT will submit all required documentation based on the project's future design needs.
5	4	Massachusetts Water Resources Authority	Once the South Station Expansion project is completed, and if the Proponent(s) intends to discharge wastewater from a vehicle wash and/or maintenance operation to the sanitary sewer system, an MWRA Sewer Use Discharge Permit will be required. For assistance in obtaining this permit, the Proponent should also contact Stephen Buczko at MWRA. Similar to the Construction Site Dewatering Permit, the Proponent is required to have this Permit prior to discharging wastewater from the vehicle wash process into the sewer system.	No vehicle wash operations are proposed as part of the SSX project.
5	5	Massachusetts Water Resources Authority	The Proponent(s) 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,	MassDOT will comply with 360 C.M.R. 10.016 as it relates to installation of gas/oil separators.

Letter No.	Comment No.	Author	Comment	Response
			and/or in the vehicle wash building planned for the site.	
5	6	Massachusetts Water Resources Authority	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.	MassDOT will comply with 248 C.M.R 2.00 and all other applicable laws.
5	7	Massachusetts Water Resources Authority	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 the Proponent(s) of each facility should contact Stephen Howard, Source Coordinator, within the Toxic Reduction and Control (TRAC) Department at (617) 305-5675.	MassDOT will contact the TRAC Department to obtain an inspection for each facility prior to obtaining approval from MWRA and the Local Plumbing Inspector.
5	8	Massachusetts Water Resources Authority	MWRA expects to continue to work closely with the Proponent and their consultants to identify where 8 (m) permits will be required.	MassDOT will continue to work with appropriate agencies to identify necessary permits.
6	1	Massachusetts Office of Coastal Zone Management	CZM requests that the proponent consider a range of flooding events over the lifetime of the project and provide information about frequency and the expected severity of inundation on the site.	FEIR Section 3.10.1, Vulnerability Assessment Comparison, incorporates the Boston Harbor Flood Risk Model, which includes a range of flooding events over various periods of time, into the sea level rise impact analysis.
6	2	Massachusetts Office of Coastal Zone Management	CZM requests that the proponent fully consider how adaptable the proposed infrastructure will be in the future, and consider upfront adaptation measures that will be very difficult to implement once the infrastructure is in place.	FEIR Sections 2.1.4, Consistency with Updated Station Design Principles, and 3.10, Climate Change, discuss adaptation strategies.

Letter No.	Comment No.	Author	Comment	Response
6	3	Massachusetts Office of Coastal Zone Management	If the proponent is considering raising the base level of the site, CZM requests that the proponent study the potential flooding impacts to adjacent sites.	At this time, MassDOT is not considering raising the base level of the SSX site.
6	4	Massachusetts Office of Coastal Zone Management	While the DEIR provides a range of potential hazard mitigation/ adaptation strategies, it does not identify which strategies will be employed. The proponent should present a clear strategy for protecting the proposed infrastructure (from flooding) in the long term.	FEIR Section 3.10, Climate Change, discusses adaptation strategies.
6	5	Massachusetts Office of Coastal Zone Management	CZM strongly recommends that the FEIR include an analysis of the preferred alternative using the dynamic model described in the DEIR, the Boston Harbor Flood Risk Model. The analysis should be accompanied by a comprehensive adaptation strategy for the proposed project.	FEIR Section 3.10.1, Vulnerability Assessment Comparison, incorporates the Boston Harbor Flood Risk Model into the sea level rise impact analysis. Section 3.10, Climate Change, discusses the project's adaptation strategy.
6	6	Massachusetts Office of Coastal Zone Management	The proposed project may be subject to CZM federal consistency review, and therefore must be found to be consistent with CZM's enforceable program policies.	FEIR Section 3.5, Chapter 91 Waterways and Tidelands, includes a consistency statement and demonstrates consistency with CZM's enforceable program policies.
7	1	Metropolitan Area Planning Council	While MAPC applauds MassDOT for analyzing the viability of new transit-oriented development, we strongly recommend further exploring creative public/private financing opportunities. Since the SSX project is currently unfunded for construction, it is essential that revenue from private investments be secured to leverage public transportation improvements.	FEIR Section 2.3, Project Cost and Funding, provides a description of MassDOT's approach to project financing.

Letter No.	Comment No.	Author	Comment	Response
7	2	Metropolitan Area Planning Council	To not preclude future private development, MAPC recommends that structural foundations be included as part of the overall station and track design regardless of what alternative is selected.	While there are currently no formal plans to include private development as part of this project, the station and track will be designed so as not to preclude future private development.
7	3	Metropolitan Area Planning Council	MAPC respectfully requests that the FEIR include an evaluation of the MBTA's plans to advance DMU service in the future and how the SSX project will integrate this service. DMU service is a critical component since this train-type is quieter, more efficient and environmentally-friendly. DMUs also rely less on layover movements than trains currently issued by the MBTA.	The Commonwealth of Massachusetts does not currently have formal plans to implement new rail technology on the MBTA's commuter rail system. However, should the Commonwealth contemplate implementing this type of technology into the system in the future, the SSX project would not preclude these services and would be compatible with the use of new technologies within the expanded terminal area.
7	4	Metropolitan Area Planning Council	There should also be a [post-development traffic] monitoring program if Alternative 1 is selected.	The SSX project only includes transportation improvements and substantially improves non-auto accommodations (transit, pedestrian, bus, and bicycle). Traffic monitoring activity would apply only to construction phases of the project and not to post-development building occupancy milestones as it normally would for a development project.
7	5	Metropolitan Area Planning Council	Performance measures should be clearly defined for public transit, walking, and bicycling as well as roadway efficiency and parking.	The DEIR includes detailed performance measurements and quality-of-service ratings for all modes, except parking, which is not provided in the preferred alternative. Refer to DEIR Appendix 9 technical reports (*Ridership Forecasting Technical Report, Transit Capacity Analysis Technical Report, Pedestrian Circulation Analysis Technical Report*, and *Traffic Analysis Technical Report*).

Letter No.	Comment No.	Author	Comment	Response
7	6	Metropolitan Area Planning Council	MAPC recommends that MassDOT monitor the project bi-annually for a minimum of five years and share their results publically. A scope and schedule of MassDOT's Transportation Monitoring Program should be clearly outlined in the Section 61 findings.	Since the project only includes transportation improvements, traffic monitoring activity would apply only to construction phases of the project and not to post-development building occupancy milestones as it normally would for a development project.
7	7	Metropolitan Area Planning Council	The DEIR states that MassDOT is currently prioritizing the advancement of projects in areas of the Commonwealth currently lacking, or underserved by, rail (particularly the South Coast and Worcester) which can be achieved through the South Station Expansion project. MAPC looks forward to reviewing this prioritized advancement of projects in the FEIR.	Many of those issues will be addressed while working through other planning studies, such as MassDOT's upcoming Rail Plan.
7	8	Metropolitan Area Planning Council	Will the SSX project impact rail freight transportation? If so, this should be addressed in the Final Environmental Impact Report (FEIR).	FEIR Appendix E, *Railroad Operations Analysis Technical Report*, addresses operating windows for existing freight service within the project study area, as it operates today. These operating windows for freight service were not adversely impacted by the modeled future year passenger rail service plans.
7	9	Metropolitan Area Planning Council	MassDOT should continue close and collaborative planning with the U.S. Postal Service on the relocation of the General Mail Facility at 25 Dorchester Avenue.	Comment noted.
7	10	Metropolitan Area Planning Council	In order to ensure the Harborwalk's longevity and the numerous public benefits it offers, the FEIR should explain how the Harborwalk will be maintained following construction.	FEIR Section 3.9.10, Maintenance of Public Realm Infrastructure, provides this information.

Letter No.	Comment No.	Author	Comment	Response
7	11	Metropolitan Area Planning Council	While MAPC is aware that the environmental impacts of a layover facility at Beacon Park Yard will be further evaluated as part of the I-90 Allston Interchange Project...there is a need for continued coordination as both projects advance.	Comment noted.
8	1	Massport	The project team should ensure that the proposed project enhances transit connectivity to the South Boston waterfront. Not only should construction of the project increase capacity for commuter rail service and operations, its design should not preclude the possible implementation of new or emerging transit service concepts that may directly use the rail lines that serve South Station. (Examples of these include new service on the Worcester Line between Allston/Brighton and South Station, connections between Back Bay Station and the South Boston Waterfront, and a connection between the Silver Line Transitway and the western commuter rail tracks along Atlantic Avenue.)	Proposed SSX project improvements to the terminal and layover locations would not preclude future service expansions.
8	2	Massport	The project design should ensure that connections to the Silver Line Transitway and Logan Airport are maintained and improved wherever possible.	The SSX project design would not impact connections between South Station and the Silver Line Transitway and/or Logan Airport.
9	1	Congressman Michael E. Capuano	First, I trust that MassDOT will satisfactorily address all relevant environmental, wetland and historical significance regulations. In particular, I expect there is great potential for significant soil contamination onsite, and I encourage	MassDOT will complete all site activities in accordance with the requirements of the Massachusetts Contingency Plan 310 CMR 40.00.

Letter No.	Comment No.	Author	Comment	Response
			MassDOT to address it appropriately.	
9	2	Congressman Michael E. Capuano	[MassDOT] need[s] to account for future rise in sea level and the impact of a storm surge.	FEIR Section 3.10.1, Vulnerability Assessment Comparison, incorporates the Boston Harbor Flood Risk Model into the sea level rise impact analysis.
9	3	Congressman Michael E. Capuano	I strongly suggest that South Station retain its classic rail station look and feel.	Comment noted.
9	4	Congressman Michael E. Capuano	I am curious as to why only sites in the urban core are being evaluated when surely there are sites outside the City of Boston that would be reasonable locations for layover space.	During the layover alternatives analysis described in DEIR Section 3.6, Layover Facility Site Alternatives Analysis, MassDOT, in coordination with the City, developed a tiered alternatives analysis process, identifying 28 alternatives for Tier 1 screening. Of the 28 candidate sites, 10 locations. that satisfied the evaluation criteria necessary to adequately support railroad operations at South Station advanced to the Tier 2 evaluation. The Tier 3 screening included detailed analysis of four potential sites. One of the siting evaluation criteria included close proximity to South Station in order to minimize conflicts between revenue and non-revenue trains between South Station and the storage yards. From this detailed evaluation, the Widett and expanded Readville – Yard 2 sites were selected as the preferred locations for south side midday layover facilities.
9	5	Congressman Michael E. Capuano	I am curious where the engines and passenger cars will be serviced - does the current South Side Maintenance Facility have the capability, or will one need to be constructed?	The MBTA's south side commuter rail equipment will continue to be serviced at the MBTA's South Side Service and Inspection Facility. Extensive equipment repairs will continue at the MBTA's Commuter Rail Maintenance Facility.

Letter No.	Comment No.	Author	Comment	Response
9	6	Congressman Michael E. Capuano	I feel it is important that during construction, the commuter rail and Amtrak trains continue to run, and impacts on both transit and private vehicle traffic be minimized.	As described in DEIR Chapter 6, rail-related construction activities would be performed in close coordination with the operating railroads, including the MBTA and its commuter rail operator, Amtrak, and CSXT. As part of the final design process, opportunities to minimize train operation disruptions by coordinating and combining rail systems' planned maintenance activities with construction activities will be further investigated. A traffic management plan will also be developed in coordination with the City of Boston to minimize impacts to vehicular traffic.
9	7	Congressman Michael E. Capuano	I strongly suggest that the final design for South Station be done in such a way that a future link to North Station is not precluded.	See response to Comment C.39.
10	1	Representative Sean Garballey	Building plans should adopt LEED Plus green building standards, minimize life-cycle costs by use of energy efficiency and renewable energy, comply with the Boston Redevelopment Authority's Climate Checklist, and adhere to the state's stretch energy code standard.	FEIR Section 3.13.9, Applicable Energy Codes, Standards, and Rating Systems, addresses this issue.
10	2	Representative Sean Garballey	All designs should account for climate change; this includes but is not limited to: increased frequency of flooding, rising sea levels, and more frequent occurrences of extreme weather.	FEIR Section 3.10, Climate Change, addresses these issues.
11	1	Representative Frank I. Smizik	South Station improvements should also reduce both GHG emissions and total energy use in all phases of design and construction. Building plans should adopt LEED Plus green building standards, minimize life-	FEIR Section 3.13.9, Applicable Energy Codes, Standards, and Rating Systems, addresses this issue.

Letter No.	Comment No.	Author	Comment	Response
			cycle costs by use of energy efficiency and renewable energy, comply with the Boston Redevelopment Authority's Climate Checklist, and adhere to the state's stretch energy code standard.	
11	2	Representative Frank I. Smizik	All designs should account for climate change; this includes but is not limited to: increased frequency of flooding, rising sea levels, and more frequent occurrences of extreme weather.	FEIR Section 3.10, Climate Change, discusses the analysis regarding sea level rise, flooding, and potential inundation.
12	1	Senator B. Tarr	I am aware of many compelling reasons to support connecting North Station and South Station via a Rail Link….I believe it would be imprudent to initiate other actions that would preclude this goal from being accomplished.	See response to Comment C.39.
13	1	Boston University	[The following] issues need to be addressed in the South Station Expansion Final Environmental Impact Report (FEIR) rather than the Allston 1-90 Interchange MEPA filings lest they "fall between the cracks." • The DEIR has failed to fully examine alternative locations or adequately explain why Beacon Yards has emerged as "the preferred" location with the least environmental impact. • The proposed maintenance facility uses of BPY seem to be vastly understated in the DEIR and are presented differently in the Allston I-90 Interchange Environmental Notification Form (ENF). The impact such a significant project and "industrial" use of the property	As described in the SSX project DEIR, the use of BPY was identified as a preferred alternative but is subject to environmental review as part of the I-90 Allston Interchange project. The I-90 Allston Interchange project is further refining the concept design and environmental evaluation of BPY, which is occurring concurrently with the SSX project. A DEIR for that project is anticipated to be filed in spring 2017. The SSX project will continue to evaluate the use of Widett Circle and expanded Readville –Yard 2 alternative sites for additional layover capacity needs to support the expansion of the terminal area.

Letter No.	Comment No.	Author	Comment	Response
			may have on Boston University and the adjoining neighborhoods.	
14	1	Harvard University	Harvard recommends that the Secretary's Certificate for the South Station Expansion project FEIR require MassDOT to provide the missing data and related analysis regarding future MBTA service needs (whether through existing rail lines or new lines) and future layup/layover needs.	As described in the DEIR, for the purpose of planning, projected future MBTA service levels were developed for the 2035 horizon year on the south side to support the analysis of the expansion of South Station and its future layover needs. The development of the 2035 operating plan and the operations analysis are described in FEIR Appendix E, *Railroad Operations Analysis Technical Report*.
14	2	Harvard University	Harvard recommends that the Secretary's Certificate on the FEIR require MassDOT to report on the status of Beacon Park Yard as MassDOT progresses through its evaluation of the 1-90 Allston Interchange project.	See response to Comment 13.1.
15	1	The Boston Harbor Association	We ask that the Secretary's Certificate have the proponent look at what transportation and circulation improvements can be made even under the "No Build" baseline alternative.	Comment noted.
15	2	The Boston Harbor Association	Incorporate other elements of the Watersheet Activation Plan, including the potential development of a pedestrian bridge crossing the Channel to enhance pedestrian access between South Station and the areas to the east of the Channel (page 50, BRA Fort Point Channel Watersheet Activation Plan), as well as possible activities on the watersheet, such as a "moveable art barge", water trail/interpretive trail, and "floating island" on the watersheet closest to the U.S.	Under Chapter 91, as a nonwater-dependent infrastructure facility the project is exempt from the regulatory standards at 310 CMR 9.51 (Conservation of Capacity for Water-Dependent Use), 310 CMR 9.52 (Utilization of Shoreline for Water-Dependent Purposes), and 310 CMR 9.53 (Activation of Commonwealth Tidelands for Public Use). Because joint development is no longer included in the project, additional public benefits related to waterfront access are not required. An updated discussion regarding the project's compliance with the Public Benefit Determination criteria is

Letter No.	Comment No.	Author	Comment	Response
			Postal Service (page 27 of BRA Watersheet Activation Plan).	included in Section 3.5.3 of the FEIR.
15	3	The Boston Harbor Association	Examine the possibility of water transportation to the South Station area.	FEIR Section 3.9.11, Water Transportation, addresses this issue.
15	4	The Boston Harbor Association	These and other measures in "Table 5.2- Risks and Mitigation Strategies Associated with Hurricane Surge and Sea Level Rise" of the Draft EIR are excellent initial measures, and we look forward to additional details in the Final Environmental Impact Report.	FEIR Section 3.10, Climate Change, discusses the project's adaptation strategy.
16	1	Association for Public Transportation	It is distinctly possible that proposed development at South Station and the South Postal Annex will make constructing the NSRL impossible.	See response to Comment C.39.
17	1	New Boston Food Market Development Corporation	Although as it is stated in the DEIR, "it is assumed that these affected businesses would be relocated within the immediate project vicinity in the Boston area, and that no long-term loss of employment would occur," we have no understanding of how, where and when our businesses would be relocated and affected. And, as stated above, we know of no other location in the City of Boston where all of our transportation and space needs could possibly be met.	FEIR Section 3.3.4, MassDOT's Legal and Regulatory Obligations, explains how the project will comply with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, 42 USC 4601, and related laws and regulations. Section 1.5.1, Update on Public Outreach Activities, describes outreach to business owners at Widett Circle.
17	2	New Boston Food Market Development Corporation	Engage in an active dialogue with our organization if Widett Circle is indeed being considered seriously as one of the layover sites.	FEIR Section 1.5.1, Update on Public Outreach Activities, describes outreach to business owners at Widett Circle.

Letter No.	Comment No.	Author	Comment	Response
18	0	Greater Boston Chamber of Commerce	No applicable comments relative to the scope of the study (letter of support).	Comment noted.
19	1	Medical Academic and Scientific Community Organization (MASCO)	We request that the Final Environmental Impact Report (FEIR) evaluate the potential impact that the added non-revenue trips between South Station and the planned layover facility at Beacon Park Yard will have on commuter rail service along the Worcester/Framingham Line and identify ways to mitigate any impacts.	FEIR Appendix E, *Railroad Operations Analysis Technical Report*, contains information about the operations analysis. This analysis includes both revenue and non-revenue train trips and their impacts to commuter rail service along the Framingham/Worcester Line and other south side lines.
20	1	Massachusetts Chapter of the Sierra Club	Trains [in layover yards] would shower yet more fumes and particulates on the city's residents.	As stated in the DEIR, locomotives accessing the layover facilities (as well as South Station) must be in compliance with the U.S. EPA Line Haul Locomotives Tier 4 Exhaust Emission Standards. The Tier 4 standards are the most restrictive locomotive standards that the U.S. EPA has in place and apply to all locomotives built or remanufactured in the year 2015 and beyond. The fumes and particulates emitted by these locomotives will be further reduced as all locomotives accessing the layover facilities for more than one hour will be connected to shore power (electrical plug-in units) during their stay at the facilities.
20	2	Massachusetts Chapter of the Sierra Club	Abutters to any layover yard would also be subjected to the constant noise of the locomotives, especially from overnight idling during the winter months.	The layover facilities at Widett Circle and Readville – Yard 2 will be used for midday layover, not overnight layover. FEIR Section 3.12.3, Potential Mitigation Measures, details the proposed noise barrier for Readville – Yard 2. In addition, the train locomotives will be plugged into shore power to minimize the amount of time that the

Letter No.	Comment No.	Author	Comment	Response
				locomotives will idle at these layover facilities.
20	3	Massachusetts Chapter of the Sierra Club	The DEIR also glosses over the operational issues of a large terminal with many stub-end tracks and limited space for an adequate "throat" of tracks and switches connecting the platforms with the approach tracks from the west and south, and with the Southampton Street yards.	FEIR Section 3.8.2, Terminal Track Configuration Alternatives Analysis, discusses the future operations and interlocking designs.
20	4	Massachusetts Chapter of the Sierra Club	Incredibly, [the DEIR] seems to believe that this project will have a negligible-or even slightly beneficial-effect upon the air quality in and around South Station.	The Air Quality impacts presented in the DEIR were prepared using the most recently approved U.S. EPA analytical tools and the most recent planning assumptions. As stated in the DEIR, Chapter 4.12.2, for the year 2025, project-related annual emissions of CO, VOC, NOx, PM_{10}, and $PM_{2.5}$ for Alternative 1 generally increase by less than 2% when compared to the area-wide emissions for the 2025 No Build Alternative. Annual project-related SO_2 emissions in 2025 decrease by about 2%. For 2035, project-related annual emissions of CO, VOC, NOx, PM_{10}, and $PM_{2.5}$ for Alternative 1 also increase by about 2% when compared to the area-wide emissions for the 2035 No Build Alternative. Annual SO_2 emissions in 2035 also decrease by about 2%. Based on this analysis, the small amount of emissions will not cause or contribute to exceedances of any air quality standards.
21	1	Don't Dump on Us Task Force	We ask that you include us in all discussions and provide ample process and information for us to offer informed input on this project.	FEIR Section 1.5.1, Update on Public Outreach Activities, describes outreach to business owners at Widett Circle.

Letter No.	Comment No.	Author	Comment	Response
22	1	Allston Group	The space for the concourse will be quite limited and that congestion at the ends of platforms will be a regular occurrence. We request that the FEIR more completely lay out what will be done to remove some of these difficulties. We also request that the FEIR show which of the concourse and platform mitigation efforts might be incorporated into the projected pedestrian movements to and from the proposed air rights projects above the concourse and platform spaces.	FEIR Section 2.1.1, Update on South Station Headhouse Design, addresses pedestrian circulation.
22	2	Allston Group	We would add that a fourth site - the existing, large and well-equipped Boston Engine Terminal in Somerville - be included in these considerations.	MBTA's Commuter Rail Maintenance Facility site (formerly referred to as the Boston Engine Terminal) was evaluated during the initial layover facility alternatives analysis conducted for the project's Environmental Notification Form (ENF). It was dismissed for the following reasons: 1) distance and travel time for midday layover operations would be substantial; 2) a reverse move would be required to access Beacon Park Yard; and 3) major infrastructure improvements would be required to the MBTA Fitchburg Route and Grand Junction Running Track.
22	3	Allston Group	We request that the Beacon Park Yard alternative be retained in the SSX FEIR analysis until the full array of layover needs can be evaluated, including a combination of the three sites.	See response to Comment 13.1.
22	4	Allston Group	Further analysis should closely examine the ways in which operations would be affected if fewer tracks for layover were	While the DEIR contemplated the use of BPY for a maximum limit of 30 trainsets for midday layover, the I-90 Allston Interchange project is currently analyzing the program for

Letter No.	Comment No.	Author	Comment	Response
			available at the Beacon Park Yards site.	midday layover functions at this facility, including associated impacts to railroad operations.
23	1	Allston Group	Serious issues of segmentation and environmental justice exist in the planning and review of the South Station Expansion, I-90 Interchange Improvement Project, and Beacon Park Commuter Rail Layover and Maintenance Yard.	The FEIR has been prepared and filed in accordance with 301 CMR 11.00.
23	2	Allston Group	The vibration, noise, air quality, and Environmental Justice impacts at Beacon Park Yard in Allston are severe.	See response to Comment 13.1.
24	1	Fidelity Real Estate Company	A study must be completed to determine the possible construction vibration and noise impact to 245 Summer Street, and more specifically to our critical computer systems. We ask that the project investigate vibration and noise for all alternatives and detail the impacts to 245 Summer Street.	FEIR Section 3.12, Noise and Vibration, describes potential project impacts. Vibration measurements were obtained 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 Real Estate Company.
24	2	Fidelity Real Estate Company	We ask that the project investigate the impact that a proposed noise wall would have on the occupants and exterior landscape of 245 Summer Street both not only from a noise perspective but also include what impact the wall would have on natural light.	The proposed 18-foot high noise barrier 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 located close to the easternmost track. As a result, the proposed noise barrier would have significantly less impact on the occupants and the exterior landscape of 245 Summer Street than the existing USPS facility.

Letter No.	Comment No.	Author	Comment	Response
24	3	Fidelity Real Estate Company	The expansion and opening of Dorchester Avenue will impact the operations of the loading dock at 245 Summer Street....We ask the project to provide clarification and inform us how our existing delivery requirements will be met without impacting the surrounding environment.	The operations of the loading dock at 245 Summer Street will be carefully reviewed as part of the engineering design of Dorchester Avenue. Detailed truck turning diagrams illustrating maneuvering operations to and from the loading dock will be prepared.
24	4	Fidelity Real Estate Company	We have critical infrastructure below grade in 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, [and what impacts the proposed changes will have to ground or salt water].	FEIR Section 3.6, Water Quality and Stormwater, and Appendix A, *Stormwater Analysis Technical Report,* detail the location and selection of stormwater BMPs on site. The proposed surface runoff quantities in post-development are less than that in pre-development. The project will not be adding any additional water to the site.
25	1	James G. Grant Co., LLC	The DEIR states that no long term loss of employment will occur as the result of taking 0.7 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 0.7 acres of Grant's property - nearly 10% of its property - will force Grant to greatly downscale its operations or cease operations altogether.	FEIR Section 3.3.4, MassDOT's Legal and Regulatory Obligations, explains how the project will comply with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, 42 USC 4601, and related laws and regulations.
25	2	James G. Grant Co., LLC	The Readville - Yard 2 layover site can accommodate the fewest eight-car trainsets of all of the proposed layover sites - only eighteen. This size may be insufficient for long term planning and growth, and should be further explored.	As stated in DEIR Section 3.6, Layover Facility Site Alternatives Analysis, MassDOT, in coordination with the City, identified any reasonable midday layover site that satisfied the evaluation criteria necessary to adequately support railroad operations at South Station. One of the siting evaluation criteria included favorable topography, shape

Letter No.	Comment No.	Author	Comment	Response
				and size. From this detailed evaluation, the Widett Circle and expanded Readville – Yard 2 sites were selected as the preferred locations for south side midday layover facilities.
25	3	James G. Grant Co., LLC	The relationship between the small size of the proposed yard and its impact on the surrounding community should be fully studied, particularly because the proposed Readville - Yard 2 layover site is located in close proximity to a single-family residential district zone.	FEIR Chapter 3, Environmental Analyses, discusses potential impacts from the proposed expansion of the Readville – Yard 2 layover facility.
25	4	James G. Grant Co., LLC	Further study should be conducted at this time in order to obtain necessary data to define the extensive wetlands permitting that may be required to develop a layover at this site.	FEIR Section 3.4, Wetlands, discusses the location and type of all jurisdictional wetlands.
25	5	James G. Grant Co., LLC	The current conditions of those drainage pipes [at Readville – Yard 2] are unknown, and more evaluation is needed in order to determine necessary design issues. These drainage issues should be fully addressed.	FEIR Section 3.6.6, Readville – Yard 2 Storm Drain Condition, addresses this issue.
25	6	James G. Grant Co., LLC	The age, condition, and size of several water pipes and sewer pipes servicing Readville - Yard 2 are unknown. Design elements and mitigation factors will depend upon the conditions of these services, and should be studied further at this time.	FEIR Section 3.6.6, Readville – Yard 2 Storm Drain Condition, addresses this issue.
25	7	James G. Grant Co., LLC	With respect to the open RTN, the impacts of these environmental issues have not been fully addressed by the DEIR.	FEIR Section 3.15, Site Contamination and Hazardous Materials, provides this information.

Letter No.	Comment No.	Author	Comment	Response
25	8	James G. Grant Co., LLC	The proposed site lies within the Neponset River Riverfront Protection Overlay District. Additional design elements will be required to construct the layover at this proposed location in order to comply with the demands of the overlay district.	MBTA services, equipment, and facilities are exempt from local zoning regulations. However, measures will be taken to mitigate environmental impacts to the Neponset River. The addition of new impervious surfaces will be minimized to the greatest extent practicable.
25	9	James G. Grant Co., LLC	Overall, the DEIR's analysis of environmental issues with respect to the proposed Readville - Yard 2 layover site is not sufficiently comprehensive, and should be further addressed.	As stated in the December 31, 2014 Secretary's Certificate, the DEIR adequately and properly complied with MEPA and its implementing regulations, and required preparation of an FEIR with a limited scope for the SSX project. This FEIR provides the results of the additional environmental analyses conducted since the DEIR.
26	1	Related Beal	We need to focus on connecting the North and South stations to resolve the growing congestion by the fact that North and South stations are not connected by rail link.	See response to Comment C.39.
27	1	Brad Bellows Architects	Linking North and South Stations will not only resolve all of the capacity constraints at both stations far into the future, while reducing the footprint of rail uses in the center city, it will also knit together our region as no other transportation investment can.	See response to Comment C.39.
27	2	Brad Bellows Architects	The SSX's air rights developments are located directly above major parts of the NSRL Atlantic Avenue and Dorchester Avenue alignments. Absent careful structural coordination, these structures may well be nails in the coffin for rail integration in Massachusetts.	See response to Comment C.39.

Letter No.	Comment No.	Author	Comment	Response
27	3	Brad Bellows Architects	A proper cost / benefit analysis of a North South Rail Link needs to be completed.	See response to Comment C.39.
28	0	Adam Castiglioni	No applicable comments relative to the scope of the study (letter of support).	Comment noted.
29	1	Frank DeMasi	The south station interlocking and layover yard improvements also provide an opportunity to improve port rail access and this need should be included in the DEIR.	FEIR Section 3.8.2, Terminal Track Configuration Alternatives Analysis, discusses the future operations and interlocking designs, while Section 3.8.4, Preferred Layover Facility Operations Assessment, discusses layover yard improvements. Access to the ports was not evaluated as part of this study.
29	2	Frank DeMasi	The alternate site for the Postal Annex needs to be considered in the DEIR. There needs to be consideration for the impact to the port if the annex is to be moved into a designated port area or property within the seaport area. Massport needs as much lay-down area as it can get or retain for its planned expansion, for both trucks, container storage, and in the future rail cars. If the Postal annex is to be moved into the DPA, consideration needs to be made on its impact on related port operations.	Comment noted.
30	1	Honorable Michael S. Dukakis	A number of us tried to point out at the outset of this process that it was essential that the any environmental review of the proposed station expansion include an analysis of the North-South Rail Link as an alternative to station expansion which would solve the congestion problem at South Station without any need for station expansion.	See response to Comment C.39.

Letter No.	Comment No.	Author	Comment	Response
30	2	Honorable Michael S. Dukakis	Through service obviates the need for midday layup/layover facilities. There is no recognition of that fact in the DEIR. Moreover, by suggesting that such a facility might be located in the Beacon Park Yard, the report ignores the adverse impact that any such facility would have on plans for high speed rail connecting Boston, Worcester, Springfield, Hartford and New York-- a key part of Governor Patrick's proposed rail plan for the Commonwealth and New England.	See response to Comment C.39.
31	1	Steve Hollinger	I support a number of objectives of the S. Station expansion project as described in the DEIR. Please include me on the list of official commenters.	Mr. Hollinger has been added to the list of DEIR commenters.
32	1	Acton Chrysler Dodge Jeep Ram	In my view the entire northeast transportation corridor would sustain broader benefits from connecting Boston's rail station system. I believe that this is the time to fully vet every option and that the NSRL merits a full review.	See response to Comment C.39.
33	1	Ned Imbrie	The plan, no matter which alternative, should include noise abatement along Atlantic Avenue, particularly near and south of the bus station entrance.	Consistent with federal requirements for noise mitigation, the project is not required to mitigate existing noise levels. However, the results of the noise modeling analysis indicate that the cumulative 24-hour (Ldn) noise levels would actually decrease along Atlantic Avenue due to the increase in the number of tracks at South Station (from 13 to 20) resulting in a redistribution of the trains away from Atlantic Avenue.
34	1	Stephen H. Kaiser	The Final EIR should identify the key critical capacity limitations as they exist today, and as they	FEIR Appendix E, *Rail Operations Analysis Technical Report*, includes a detailed discussion of existing and

Letter No.	Comment No.	Author	Comment	Response
			might continue in the future with the new designs in place.	potential future rail operations. The capacity limitations as they exist today consist of a combination of several factors, including the configuration of platform tracks at South Station, the location and availability of rail layover space, and the configuration and rail operations through the interlockings.
34	2	Stephen H. Kaiser	One useful effort would be to look at the original South Station track plan of 1899 when close to 20 tracks existed. Was there an interlocking problem then, or did the old-timers have it solved?	FEIR Section 3.8.2, Terminal Track Configuration Alternatives Analysis, discusses the future operations and interlocking designs.
34	3	Stephen H. Kaiser	Capacity and operations issues should be considered for both normal or average day operations, as well as response to severe disruptions, such as a blockage of the Tower 1 interlocking tracks. What are worst case scenarios which MassDOT hopes to address?	FEIR Appendix E, *Rail Operations Analysis Technical Report*, includes a detailed discussion of existing and potential future rail operations. The operations analysis incorporates randomized delays to the schedules in each simulation run, resulting in delay and on time performance statistics. These statistics are then averaged to determine the impacts to South Station and Tower 1 operations on a typical or average day of operations.
34	4	Stephen H. Kaiser	Will the use of more bi-level cars result in delays loading and unloading, as waiting passengers crowd the platforms near the two entrance doors to each car?	The use of more bi-level cars would be expected to result in longer dwell times as compared to the use of single level cars. The operations analysis conducted for the SSX project included simulated dwell times developed from existing operations data. At South Station, the 2035 horizon year operations analysis included a minimum turn time of ten minutes for each train, with a preferred scheduled turn time of 15 minutes or more where possible. Hence, the use of more bi-level cars is not expected to result in additional delays to operations at

Letter No.	Comment No.	Author	Comment	Response
				South Station. Additional information on the operations analysis is included in FEIR Appendix E, *Rail Operations Analysis Technical Report*.
34	5	Stephen H. Kaiser	Will future Amtrak and commuter rail passengers seeking to continue their trip encounter peak hour congestion and delays on the Red and Silver Lines?	Appendix F, Transportation Documentation, demonstrates that the project would not result in crowding impacts to the Red Line and/or Silver Line that would exceed the MBTA's *Service Delivery Policy* maximum load more than impacts anticipated in the No Build Alternative.
34	6	Stephen H. Kaiser	Both the EIR text and appendices need a closer comparison of existing and future conditions at each key [platform] congestion or trouble spot.	The methodology and results of an updated transit capacity analysis within transit vehicles is presented in FEIR Appendix F, *Transportation Documentation.* For this analysis, the future No-Build year (2035) scenario, representing the future baseline conditions without the expansion of South Station, was compared to the future Build year (2035) conditions, with the expansion of South Station in place. Additionally, a discussion of the updated South Station design and passenger circulation is provided in Section 2.1, South Station Headhouse Design Updates.
34	7	Stephen H. Kaiser	The data presented on page 2-6 suggest that there would be an increase in Amtrak daily train movements from 72 to 138, or an increase of 92% over the next 20 years. However, the increase in Amtrak ridership would be only 37%. Are these numbers correct and do they reflect a proper planning for efficient passenger handling?	The comparison of train increases to ridership projections is not a direct one-to-one relationship; meaning for every seat on a train added, the ridership count does not increase by one. Ridership projections are a function, in part, of the markets being served, the capacities of trains that will be provided to these markets, and other functions such as parking constraints. From the *Transit Cooperative Research Program's Research Results Digest 4*: "External

Letter No.	Comment No.	Author	Comment	Response
				forces—population change, development trends, regional economic conditions, decisions of specific firms, other public policy decisions—frequently have a greater effect on ridership than system and service design initiatives." Additionally, ridership can be attributed only to the number of revenue train movements, not the total of all trains inclusive of both revenue and non-revenue moves. These additional revenue trains in the future Build year include expanded Acela service between Boston and New York City/points south via the NEC, and proposed New England Regional services that could operate between Boston and Springfield with shorter trainsets to better match the demands in this market area. The anticipated growth in Amtrak daily train movements, revenue trains, and the comparison to ridership is summarized in Table 5-4, Amtrak Growth Summary.
34	8	Stephen H. Kaiser	The daily MBTA commuter trains would increase from 377 moves to 416, an increase of 13%. The percentage increase in commuter rail riders is almost the same as Amtrak -- 33%. The basic results warrant further detailed explanation.	The comparison of train increases to ridership projections is not a direct one-to-one relationship; meaning for every seat on a train added, the ridership count does not increase by one. Ridership projections are a function, in part, of the markets being served, the capacities of trains that will be provided to these markets, and other functions such as parking constraints. From the *Transit Cooperative Research Program's Research Results Digest 4*: "External forces—population change, development trends, regional economic conditions, decisions of specific firms, other public policy decisions—frequently have a greater effect on ridership than system and

Letter No.	Comment No.	Author	Comment	Response
				service design initiatives." Additionally, ridership can be attributed only to the number of revenue train movements, not the total of all trains inclusive of both revenue and non-revenue moves. A substantial portion of the projected increase in MBTA ridership is attributable to the proposed new service to Fall River/New Bedford. Increased service to existing commuter rail markets, including additional peak period, peak direction trains on the Needham, Franklin, Providence, and Framingham/Worcester commuter rail lines also contribute to ridership increases. In the 2035 Build Alternative, for purposes of planning, commuter rail trainset capacity to all markets is assumed to substantially increase due to the operation of longer, 8-car trainsets with all bi-level coaches (car seated capacity of 185), for a total trainset capacity of 1,480 passengers. The anticipated growth in MBTA daily train movements, revenue trains, and the comparison to ridership is summarized in Table 5-4, MBTA Growth Summary.
34	9	Stephen H. Kaiser	The volume to capacity ratios are shown for various rail lines. I urge that careful thought should be given to revising all of the numbers.	The methodology and results of an updated transit capacity analysis, including volume to capacity ratios, is presented in FEIR Appendix F, *Transportation Documentation*.
35	1	Kenneth J. Krause	The Final Environmental Impact Report should be required to provide the specific details in all relevant areas of the project that will ensure that the SSX is being planned with the future North-South Rail Link in mind.	See response to Comment C.39.

Letter No.	Comment No.	Author	Comment	Response
36	1	Robert J. La Tremouille	Addition of one or more tracks in the area facing Dorchester Avenue should be seriously considered.	MassDOT has analyzed numerous different alternatives to date and has selected the Preferred Alternative. DEIR Appendix 2, *Track Configuration Alternatives Analysis–Tier 2 Screening Technical Report*, discusses the reason for selecting the 20 track alternatives.
36	2	Robert J. La Tremouille	At minimum, an analysis [of any choke point problem in the entrance to South Station] should be presented.	FEIR Section 3.8.2, Terminal Track Configuration Alternatives Analysis, discusses the future operations and interlocking designs. DEIR Appendix 2, *Track Configuration Alternatives Analysis Report,* discusses the Tower 1 Interlocking and the entrance to South Station.
36	3	Robert J. La Tremouille	Can the expansion project build under tracks 11, 12, and 13 and others for future expansion? Why not include that in the analysis as well?	FEIR Section 3.8.3, Track Layout Capacity and Future Ridership, discusses accommodations for future conditions. MassDOT is not proposing underground expansion as part of this project.
36	4	Robert J. La Tremouille	Why not use underground expansion in the future for parking in the short run as in the bus facility?	MassDOT is not proposing underground expansion as part of this project.
37	1	Katherine Green Meyer	[I support the project if] the North South link possibility is not cut off by this work.	See response to Comment C.39.
37	2	Katherine Green Meyer	[I support the project if] the rail connection to the Port is kept and improved.	The SSX project does not provide rail access to the port.
37	3	Katherine Green Meyer	Also, the rent for retail, etc. should be estimated conservatively. The figures for rent and vacancies for Union Station (D) should be studied.	Joint development is no longer part of the project.
38	1	Gerry Pieri	We must allow space for a 4-track Red Line station (with two platforms) on the second level above tracks 15 through 18 along	Consideration of such a design is not within the scope of the project.

Letter No.	Comment No.	Author	Comment	Response
			including space for a robust interlocking. (Two tracks will not work.)	
38	2	Gerry Pieri	The current storage of train-sets at Readville completely violates environmental and operational goals: • It involves nearly a 9-mile move (twice a day) for each stored train-set – using energy, creating emissions, and creating operational conflicts with revenue trains. • The Readville facility traditionally has been a source of displeasure to – and opposition from -- its neighbors (in what is essentially a residential neighborhood). • The location provides almost no options for crew members who are expected to lay-over at the site.	The proposed expansion of the Readville – Yard 2 layover facility will mitigate the project's environmental impacts to the surrounding area in compliance with the requirements of the state and federal environmental review processes. CTPS provided regional CO_2 emissions data to the SSX project team for each of the modeled alternatives, using the same methodology as for Boston Region MPO's Long Range Transportation Plan's regional air quality conformity determinations. Those data show a decrease in region-wide CO_2 emissions associated with the transportation improvements at South Station. The expanded layover facility will provide support facilities, including accommodations for crew members.
38	3	Gerry Pieri	It is critical that the layout of [the Widett Circle site] provides room for adequate support columns to enable air rights development – even if this means that one or two of the 28 tracks are sacrificed.	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 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, which are outside the scope of this project. As any City efforts advance, MassDOT will continue to coordinate with the City to help realize a future development vision for Widett Circle.

Letter No.	Comment No.	Author	Comment	Response
38	4	Gerry Pieri	The author conducted detailed analysis of all of the movements (scheduled and "pullback"at South Station as part of the Central Artery / Tunnel ("Big Dig") project. The inescapable conclusion was that station track assignments which minimized cross-over moves could resolve all track-occupancy conflicts during the "Big Dig" – to the extent that a two-track (rather than three-track) temporary bridge crossing over the Fort PointChannel was workable – thereby saving tens of millions of dollars in project costs. The current DEIR should be revisited to possibly revise the proposed interlocking design.	FEIR Section 3.8.2, Terminal Track Configuration Alternatives Analysis, and Appendix D, *Track Configuration Alternatives Analysis - Tier 2 Screening Technical Report*, discusses interlocking design.
38	5	Gerry Pieri	The author strongly endorses the concept of an additional headhouse providing direct access from Dorchester Avenue.	Comment noted.
39	1	James RePass	Building or expanding dead-end rail stations in major cities, when they can be connected, is foolish. No European country would dream of engaging in a project as ill-conceived as this one, in a city where the two major terminals are literally a mile apart, and where connecting them would provide not only the capacity both North and South stations need, but create a new through-service up and down the Eastern Seaboard of New England for both intercity and commuter rail trains, effectively quadrupling the size of the employee/employer pool.	See response to Comment C.39.

Letter No.	Comment No.	Author	Comment	Response
40	1	Joseph Rogers	It is imperative that the A Street parcels are developed within the stated objectives and guidelines of the City of Boston One Hundred Acre Plan.	Development of the A Street parcels is beyond the scope of the project.
41	1	Frederick Salvucci	[Request] greater specificity [on] the intended end state upon project completion, and the compatibility of the intended end state with other MassDOT priorities (see comments 41.2-9)	See response to Comments 41.2-9 below.
41	2	Frederick Salvucci	[Request greater specificity on compatibility with] new DMU service to better serve the Fairmount Branch and the proposal for DMU service from Back Bay to the convention center.	The Commonwealth of Massachusetts does not currently have formal plans to implement new rail technology on the MBTA's commuter rail system. However, should the Commonwealth contemplate implementing this type of technology into the system in the future, the SSX project would not preclude these services and would be compatible with the use of new technologies within the expanded terminal area.
41	3	Frederick Salvucci	[Request greater specificity on compatibility with] the expansion of the Bus Terminal.	FEIR Section 2.1.1, Update on South Station Headhouse Design, discusses access to the existing and expanded Bus Terminal.
41	4	Frederick Salvucci	[Request greater specificity on compatibility with] a Massport South Station to Logan direct shuttle.	Assessing compatibility with a Massport South Station to Logan Direct shuttle is beyond the scope of the project.
41	5	Frederick Salvucci	[Request greater specificity on compatibility with] the pedestrian access to the expanded Bus Terminal.	FEIR Section 2.1.1, Update on South Station Headhouse Design, discusses pedestrian access to the existing and expanded Bus Terminal.
41	6	Frederick Salvucci	[Request greater specificity on compatibility with] the pedestrian flows of the rail and bus patrons through the common commercial service area.	FEIR Section 2.1.1, Update on South Station Headhouse Design, discusses pedestrian flows of rail and bus patrons.

Letter No.	Comment No.	Author	Comment	Response
41	7	Frederick Salvucci	[Request greater specificity on compatibility with] connections to the Red and Silver Lines.	FEIR Section 2.1.1, Update on South Station Headhouse Design, discusses connections to the Red and Silver Lines.
41	8	Frederick Salvucci	[Request greater specificity on] the partial expansion possibilities in the event that the U.S. Post Office continues to not agree with the proposed relocation.	MassDOT does not have plans to expand South Station without the USPS property as part of the SSX project.
41	9	Frederick Salvucci	[Request greater specificity on] the sequence of improvements that will allow the quality and capacity of service to South Station to grow in the near term when, even with the full cooperation of the Post office in relocating, passenger demand will continue to grow, while capacity may diminish because of construction disruption, particularly in the intensively used Back Bay to South Station track and signal area.	Appendix G, *Construction Management Plan*, discusses the sequence of improvements.
41	10	Frederick Salvucci	I have a particular concern that there needs to be much more transparency about the potential to increase capacity in the interlocking. MassDOT has announced a policy of tripling the mode share of transit use statewide, which implies more than tripling of passenger rail capacity to the high growth Seaport Innovation district, which is already overloading. The my [*sic*] auto capacity and causing problems with regional access to Logan. Yet the DEIR shows a 50% increase in track layout in South Station, but only about 30% to 35% increase in passengers by the 2035 period, nowhere near enough to keep	FEIR Section 3.8.3, Track Layout Capacity and Future Ridership, addresses these issues. The MassDOT mode shift policy called for tripling the share of non-single-occupancy vehicles, not transit specifically.

Letter No.	Comment No.	Author	Comment	Response
			pace with either environmental or economic necessities.	
41	11	Frederick Salvucci	Is there [a hidden constraint or] an assumption of inadequate rolling stock capacity? Is there a signal and track capacity constraint between Back Bay and South Station that is projected to constrain capacity? Is the commitment to maintain the option for eventual service to North Station and/or Logan constraining capacity? Or might those extensions actually be needed to achieve the tripling and more of capacity needed for economic and environmental policies to be satisfied? Would the use of greater numbers of DMU services to Fairmount, to Needham, to West Station and Newton add or complicate capacity?	For the purposes of planning, rolling stock capacity was not considered to be a constraint on projected ridership growth. The proposed expansion of South Station considers and accommodates the signal and track constraints between Back Bay Station and South Station. Potential rail connections to North Station and Logan Airport are not within the scope of the SSX project and were therefore not evaluated as part of the analysis. The use of new rail technology on the south side lines are not within the scope of this project, but would not be precluded in the future.
41	12	Frederick Salvucci	Moreover, what about layup capacity which is a problem today? The only efficient near term option is to use Widett circle, which is close, and in the less complex southern direction. Readville may be essential, but how long will it take to be operational?	The SSX project continues to evaluate both the Widett Circle and the expansion of Readville – Yard 2 as future layover facilities.
42	1	Drew Volpe	The current plan is thin on details of the architecture and design of the expansion.	Details of the architecture and design of the expansion will be developed as the project progresses.
42	2	Drew Volpe	I think this site would be perfect for a significant work of public art.	Comment noted.

Table 5-3 — Amtrak Growth Summary

Amtrak	Total Daily Trains	Daily Revenue Trains	% Growth	Estimated Ridership (boardings/alightings)	% Growth
Existing	72	40	-	4,100	-
2035 No-Build	72	40	0%	5,500	34%
2035 Build	138	80	100%	9,300	69%

Table 5-4 — MBTA Growth Summary

MBTA	Total Daily Trains	Daily Revenue Trains	% Growth	Estimated Ridership (boardings/alightings)	% Growth
Existing	377	280	-	42,000	-
2035 No-Build	416	280	0%	56,000	33%
2035 Build	416	315	13%	72,000	29%