

On page 2 of the 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.

5.1

The WWTR separately describes local and state regulations requiring I/I removal at a ratio of 4 gallons I/I removed for every new gallon of sanitary flow to ensure the mitigation of these potential impacts. The Proponent commits to 4:1 I/I removal to offset new wastewater flows generated at the South Station site. I/I removal from hydraulically related systems may occur remote from the project site. 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 way that causes greater CSO discharges at nearby CSO regulators and outfalls, notwithstanding the removal of extraneous flows elsewhere.

5.2

On page 7 of the WWTR, the report states that flows in a 32-inch by 42-inch MWRA sewer that crosses the Beacon Park Yard discharges to MWRA's Cottage Farm CSO facility in Cambridge. While downstream MWRA sewers can overflow to the Cottage Farm CSO Facility, wastewater flows in this sewer are normally conveyed to MWRA's Ward Street Headworks in Roxbury, which directs the flows to the Deer Island Treatment Plant.

#### TRAC Discharge Permitting

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. The Proponent and Contractor are prohibited from discharging groundwater into the sanitary sewer system unless a Construction Site Dewatering Discharge Permit has been issued from both the MWRA and Boston Water Sewer Commission.

5.3

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.

5.4

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

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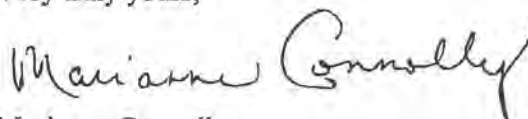
#### Section 8 (m) Permitting

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

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

5.8

Very truly yours,



Marianne Connolly  
Sr. Program Manager,  
Environmental Review and Compliance

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

TO: Maeve Vallely Bartlett, Secretary, EEA  
ATTN: Holly Johnson, MEPA Unit  
FROM: Bruce Carlisle, Director, CZM  
DATE: December 23, 2014  
RE: EEA 15028 – South Station Expansion Project

The Massachusetts Office of Coastal Zone Management (CZM) has completed its review of the above-referenced Draft Environmental Impact Report (DEIR), noticed in the *Environmental Monitor* dated November 5, 2014 and offers the following comments.

### Project Description

The South Station site consists of approximately 49 acres south of Summer Street along the Fort Point Channel in Downtown Boston. The project consists of the expansion of the South Station facility onto the adjacent United States Postal Service ("USPS") site along the Fort Point Channel, the construction of one or more layover facilities, and the potential for joint/private development over an expanded South Station. The DEIR identifies and analyzes three different build alternatives; 1) Transportation Improvements Only; 2) Joint/Private Development Minimum Build; and 3) Joint/Private Maximum Build. The alternatives vary in the amount of joint/private development provided for above the expanded tracks on the site. Alternative 1 provides for the expansion of South Station onto the adjacent 16 acre USPS site. The existing building would be demolished, up to seven tracks would be constructed, and the transit concourse would be expanded to include additional passenger support services. This alternative also includes the opening of Dorchester Avenue to public access with vehicular access, bike lanes, sidewalks and an extension of the Harborwalk. Alternative 2 includes all of the components of Alternative 1, as well as the provision for future mixed-use development on the site. The future development would be limited to what is allowed by the Waterways Regulations (heights ranging from 55 feet to 142 feet) and is considered the minimum build scenario. Alternative 3 includes all of the components of Alternative 1 as well as the provision for future mixed-use development on the site up to the maximum amount possible. The maximum build would be located closer to the Fort Point Channel with a smaller setback (Water-Dependent Use Zone) than Alternative 1 and would be limited by FAA's maximum building height, which is approximately 290 feet. This alternative would not meet the requirements of the Waterways Regulations and would require an amendment to the City of Boston's Fort Point Downtown Waterfront District Municipal Harbor Plan to allow for increased heights and a reduction in the Water-Dependent Use Zone.

### Project Comments

CZM is supportive of the proposed expansion project as it will increase public transportation capacity, increase public access to and along the waterfront, and activate the last remaining privatized portion of the Fort Point Channel. CZM commends MassDOT for meeting the Chapter 91 open space requirements for each of the build scenarios. Connecting the missing Harborwalk link along the channel and creating new public open space will provide significantly more activation and enjoyment of the waterfront in this location.





As discussed in the DEIR, Alternatives 1 and 2 would meet the requirements of the Waterways Regulations and would not require an amendment to the Fort Point Downtown Waterfront District Municipal Harbor Plan. However, Alternative 3 would exceed the dimensions of development allowed by the Waterways Regulations and would require an amendment to the City of Boston's Fort Point Downtown Waterfront District Municipal Harbor Plan.

The City of Boston's Fort Point Downtown Waterfront District Municipal Harbor Plan ("MHP") sets up a planning framework for the area along the Fort Point Channel from the Old Northern Avenue Bridge to the Dorchester Avenue Bridge. Phase 1 of the MHP provided site specific substitutions and offsets for the Intercontinental Hotel parcel located at 500 Atlantic Avenue. Phase 2 of the MHP provided site specific substitutions and offsets for the Atlantic Wharf parcel. The 2004 Secretary's Decision on Phase 2 of the MHP anticipated an amendment of the MHP to provide for track expansion and additional development at the USPS site. The Secretary provided guidance regarding the development of an amendment for the planning area south of Summer Street, requiring a comprehensive master planning effort for the area prior to submitting an MHP Amendment.

The Phase 2 Decision provided specific guidance for the master planning effort, requiring such an effort to include a discussion on how new development in the area will accommodate both track expansion and state policy objectives for Commonwealth Tidelands. As detailed in the Phase 2 Decision, the master planning effort should convey the overall vision for the area and address the following:

- Public access to high-quality waterfront open space along the Fort Point Channel (and not just concentrated at the southerly end).
- Pedestrian links to the waterfront from inland open spaces areas.
- Preparation of a detailed network plan describing the location and programming of all interior ground-level public space (Facilities of Public Accommodation or "FPAs"). Reflective of the significant Commonwealth Tidelands area, and to ensure year-round public activation of this area, it is expected that at least 25% of the required FPA space to consist of Special Public Destination Facilities.

Following a comprehensive planning process, an MHP Amendment that implements the planning vision for the area can be submitted to the Secretary for review according the procedures outlined in 301 CMR 23.06. Development of the MHP Amendment should be guided by the original Notice to Proceed for the Fort Point Downtown Waterfront District Municipal Harbor Plan. It is anticipated that the master planning process and the MHP Amendment will draw from the City's Fort Point Channel Watersheet Activation Plan that was completed in 2002 to provide a menu of public benefits for development projects along the channel. The MHP Amendment must be approved by the Secretary prior to the filing of a Final Environmental Impact Report (FEIR).

A shadow analysis comparing Alternative 2 with Alternative 3 is included in the DEIR. CZM understands that the shadow analysis was performed using the Chapter 91 compliant build out of Alternative 2 and the massing concept for Alternative 3. The massing concept for Alternative 3 includes a series of 21-story buildings arranged in a particular way on the project site. The use of the Alternative 3 massing concept is helpful to get a general idea of what the potential shadow impacts may be with a maximum build development scenario. However, the actual layout of the buildings may change as the development of the site progresses from conceptual to actual. Therefore, to assess all possible shadow impacts of the maximum build out, during the MHP Amendment process, a shadow analysis should be completed using the full envelope of possible Alternative 3 build out. This shadow analysis will result in more shadow impact than would actually be possible under an actual design, but it will show all of the possible locations where shadow might occur and how much impact is possible with any particular arrangement of buildings at the maximum height.

The DEIR includes a discussion of the existing conditions of the site in relation to flooding during 100-year storm events, and also provides basic information regarding storm conditions with sea level rise of two feet. The DEIR states that approximately 2.9 acres of the site are within the 100-year floodplain and approximately 18.9 acres of the site are within the 500-year floodplain. The DEIR states that adding two feet to the flood elevations would result in a 100-year floodplain that encompasses approximately 38 acres of the site, representing nearly complete inundation of the site and infrastructure during a 100-year flood event. The DEIR focuses on the bounds of inundation, but does not provide information on the depths associated with inundation during a 100-year flood event. 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. Knowing the severity of the anticipated flooding over the design life of the structures during various flooding events will help to inform and identify adaptation strategies. 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.

6.1

6.2

The analysis provided in the DEIR includes a chart of risks and potential hazard mitigation/adaptation strategies, ranging from elevating critical systems to elevating the base level of the site. CZM commends the proponent for including a full range of strategies, and fully supports all efforts to elevate and waterproof all critical systems and infrastructure on the site. 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. 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 in the long term. Additionally, the proponent should identify adaptation measures and design guidelines for the proposed buildout associated with Alternatives 2 and 3. An adaptation strategy for new buildings on the site should be developed during the City's MHP Amendment process, and should include clear guidance as to which measures should be implemented at the time of construction and which measures can be employed incrementally after the site is developed.

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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.

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### **Federal Consistency Review**

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. For further information on this process, please contact Robert Boeri, Project Review Coordinator, at 617-626-1050, or visit the CZM web site at [www.mass.gov/czm](http://www.mass.gov/czm).

6.6

BKC/vg

cc: Valerie Gingrich, CZM  
Ben Lynch, DEP Waterways  
Nancy Baker, DEP  
Richard McGuinness, BRA  
Chris Busch, BRA  
Boston Conservation Commission



Smart Growth & Regional Collaboration

December 24, 2014

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

RE: South Station Expansion Project, MEPA#15028

Dear Secretary Bartlett:

The Metropolitan Area Planning Council (MAPC) regularly reviews proposals deemed to have regional impacts. The Council reviews proposed projects for consistency with *MetroFuture*, the regional policy plan for the Boston metropolitan area, the Commonwealth's Sustainable Development Principles, the GreenDOT initiative, consistency with Complete Streets policies and design approaches, as well as impacts on the environment. MAPC also has a long-term interest in alleviating regional traffic and environmental impacts, consistent with the goals of *MetroFuture*. The Commonwealth also has established a mode shift goal of tripling the share of travel in Massachusetts by bicycling, transit, and walking by 2030. It is also important to note that the Commonwealth has a statutory obligation to reduce Greenhouse Gas emissions by 25% from 1990 levels by 2020 and by 80% from 1990 levels by 2050. We take all of these issues into account in our MEPA comments.

The South Station Expansion Project (SSX project) consists of a 49-acre site located in and around the existing South Station Transportation Center. The purpose of the SSX project is to expand rail capacity and related layover capacity in order to meet current and future high-speed, intercity, and commuter rail service needs. The SSX project involves the proposed expansion of terminal facilities at South Station, including the acquisition and demolition of the adjacent U.S. Postal Service General Mail Facility. Providing for potential future development, extending the Boston Harborwalk along a reopened Dorchester Avenue, and designating a rail vehicle layover area are other integral components of this project.

The SSX project will improve the efficiency of public transportation, support forecasted increases in ridership, advance transit-oriented development, and provide multi-modal connections – investments that are all vital to sustaining and improving the Boston area's economy and quality of life. This complex project is a critical component of both the Commonwealth's regional transportation network and the long term growth and viability of the Northeast Corridor.

Included as an attachment to this letter are MAPC's comments on the Draft Environmental Impact Report (DEIR) which focus on the importance of integrating infrastructure improvements with future development. Incorporating these comments will help ensure that the Commonwealth will advance a project that both balances and improves local and regional accessibility along with opportunities for a more livable urban environment.

Thank you for the opportunity to comment on this important project.

Sincerely,

Martin Pillsbury  
Environmental Planning Director

cc: John Barros, Chief of Economic Development  
Kairos Shen, BRA  
James Gillooly, BTB



## **Metropolitan Area Planning Council (MAPC) Comments on South Station Expansion Project DEIR, MEPA #15028**

### **Joint/Private Development**

The Joint/Private Development Minimum and Maximum Build Alternatives are primarily distinguished by the degree to which private development could be accommodated at South Station. Representing the lower and upper limits, Alternative 2 would include approximately 660,000 sf of mixed-use development and 234 parking spaces. Alternative 3 would provide slightly over 2 million sf of mixed-use development and 506 parking spaces.

To help determine the selection of a project alternative, MassDOT is conducting an in-depth financial feasibility analysis of the joint/private development alternatives. This analysis will evaluate revenues that could be accrued by leasing air rights and determine if potential development opportunities would be financially viable from the real estate industry's perspective. 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.

7.1

The SSX project provides a tremendous opportunity to successfully incorporate growth in transit ridership and mixed-use private investment. If properly designed, transit-oriented development could have a transformative impact by creating an active, mixed-use area above and around South Station. MAPC looks forward to reviewing this analysis in the Final Environmental Impact Report (FEIR).

### **Coordination of Development Projects**

- In the next phase of project development, the design elements of the 1.8 million sf South Station Air Rights project and the SSX project will need to be carefully coordinated to ensure consistency in planning and design. If additional private development advances, it is essential that these projects also receive the same level of review.
- 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.

7.2

### **Diesel Multiple Units (DMU)**

MassDOT's FY2014-FY2018 Transportation Capital Investment Plan has set aside \$190 million for the implementation of Diesel Multiple Units (DMU). There are plans to utilize DMU trains on the Indigo Line – which would extend beyond South Station to Fort Point and southwest on the Fairmount Line. There are also plans to utilize DMU service at West Station in Allston.



Harvard University's April 9, 2013 comment letter raised concerns regarding the lack of inclusion of impending DMU service in the SSX project's Environmental Notification Form (ENF). While the DEIR does respond by stating that "MassDOT and the MBTA are currently developing a pilot program for DMU service on the MBTA system, outside of the South Station Expansion project. As MassDOT moves forward on plans for the SSX project, tracks, signals, layover facilities and other infrastructure will be designed so that DMUs can be accommodated in the future." In spite of this response, the DEIR does not provide additional information or analysis regarding DMU service. 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.

7.3

### Vehicular Traffic

There are a significant number of signalized intersections in the study area which are forecast to operate at degraded or failing Level of Service (LOS), especially along Atlantic Avenue and Dorchester Avenue. The table below summarizes the projected LOS for the four alternatives in the year 2035. Intersections highlighted in yellow are forecast to operate at LOS E or F. MAPC recommends that improvements be made to these intersections as part of mitigation if private developments are proposed.

### Intersection Capacity Analysis – 2035

Intersection	No Build Alternative		Alternative 1 Transportation Improvements Only		Alternative 2 Joint/Private Development Minimum Build		Alternative 3 Joint/Private Development Maximum Build	
	AM Peak	PM Peak	AM Peak	PM Peak	AM Peak	PM Peak	AM Peak	PM Peak
Congress Street at Dorchester Avenue	D	C	D	D	D	E	D	F
Atlantic Avenue at Seaport Boulevard	F	F	F	F	F	F	F	F
Atlantic Avenue at Congress Street	D	E	D	E	D	E	D	F
Purchase Street at Congress Street	C	F	C	F	C	F	D	F
Atlantic Avenue at Summer Street	F	E	F	D	F	D	F	D
Purchase Street at Summer Street	E	B	E	B	E	B	E	B
Surface Road at Essex Street/Lincoln Street	D	F	D	F	D	F	D	F
Atlantic Avenue at Kneeland Street	F	E	F	E	F	E	F	E
Surface Road at Kneeland Street	E	F	C	F	D	F	D	F
Dorchester Avenue at West Broadway/Traveler Street	F	E	F	F	F	F	F	F
Dorchester Avenue at West 4th Street	E	D	E	F	E	F	E	F
Purchase Street at I-93 Off-Ramp & Seaport Boulevard	E	F	E	F	E	F	E	F
Congress Street at A Street / Thompson Place	F	F	E	E	E	E	E	E

Source: South Station Expansion Project, DEIR, October 2014, Volume 2: Appendix 9 - Traffic Analysis Technical Report - Tables 36, 47, 65, and 71.

### **Transportation Monitoring Program**

If Alternatives 2 or 3 are selected, MassDOT has committed to working with the Boston Transportation Department to conduct a post-development traffic monitoring program. The program would be conducted prior to the start of construction of each phase and would be repeated six months after the issuance of occupancy certificates. While MAPC is encouraged MassDOT has committed to a monitoring program, it should be more comprehensive. There should also be a monitoring program if Alternative 1 is selected.

7.4

Performance measures should be clearly defined for public transit, walking, and bicycling as well as roadway efficiency and parking. This information will be critical to determine whether the SSX project has been effective in meeting its anticipated outcomes. The results from the monitoring program will provide guidance for project refinements, if necessary. 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.

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### **Prioritizing Advancement of Projects**

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

7.7

### **Layover Facility**

MAPC recognizes that MassDOT has selected the use of Beacon Park Yard in the west as the preferred alternative for a layover facility and that further analysis will be conducted as part of the I-90 Allston Interchange project's environmental review. MAPC is aware that MassDOT may select a preferred alternative for the layover facility sites on the south serving South Station and will present this finding in the SSX project's FEIR.

### **Grand Junction Rail Line**

Will the SSX project affect operations on the Grand Junction rail line? Use of this rail line is a component of the I-90 Allston Interchange Project and future access to this rail line should not be precluded.

### **Freight**

Will the SSX project impact rail freight transportation? If so, this should be addressed in the Final Environmental Impact Report (FEIR).

7.8

#### **U.S. Postal Service General Mail Facility**

MassDOT should continue close and collaborative planning with the US Postal Service on the relocation of the General Mail Facility at 25 Dorchester Avenue.

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#### **Reopening Dorchester Avenue and Incorporating Complete Streets Principles**

MAPC strongly supports reopening Dorchester Avenue for public use, especially for pedestrians and bicyclists in addition to providing a new headhouse and major station entrance. The reopened segment of Dorchester Avenue would include a new cycle track, buffered from traffic and running parallel to the newly created Harborwalk along Fort Point Channel. The cycle track would also provide new connections between Summer Street and the proposed South Bay Harbor Trail in South Boston. An opportunity is also presented to establish potential bus connections to downtown Boston and the South Boston Waterfront/Innovation District. Furthermore, if properly designed, the SSX project would provide a new area for curbside activity on Dorchester Avenue which could relieve traffic on Atlantic Avenue.

#### **Harborwalk**

MAPC applauds MassDOT for including construction of the Harborwalk adjacent to the Fort Point Channel and Dorchester Avenue. 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.

7.10

#### **Beacon Park Yard**

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, we would like to note that Harvard University has expressed concerns regarding public transportation and safety in their comment letter for the SSX project's ENF dated April 9, 2013. Specifically, Harvard pointed out that Beacon Park Yard will be needed on an interim bases to support construction work related to the I-90 Allston Interchange project and indicated that the development of West Station may be hindered. There is a need for continued coordination as both projects advance.

7.11





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December 23, 2014

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

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

Dear Secretary Bartlett:

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

We offer the following comments:

- 8.1
  - 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.)
- 8.2
  - The project design should ensure that connections to the Silver Line Transitway and Logan Airport are maintained and improved wherever possible.

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

Sincerely,  
Massachusetts Port Authority

Stewart Dalzell  
Deputy Director  
Environmental Planning & Permitting

Cc: B. Desrosiers, T. Ennis/Massport

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## Congress of the United States House of Representatives

Michael E. Capuano  
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December 4, 2014

Secretary Maeve Veliely Bartlett  
Executive Office of Energy and Environmental Affairs  
MEPA Office  
ATTN: Holly Johnson, MEPA Analyst  
EEA #15028  
100 Cambridge St., Ste. 900  
Boston, MA 02114-2524

Dear Secretary Bartlett:

I am writing with regard to your office's request for comments on the Massachusetts Department of Transportation's (MassDOT) Draft Environmental Report for the South Station Expansion project (SSX), EOE# No. 15028. I appreciate the opportunity to share my thoughts on how MassDOT should proceed with improving the Governor Michael S. Dukakis Transportation Center at South Station (South Station).

First, I want to re-affirm my support for the SSX project. South Station, in the heart of Boston, is a transportation nexus, combining the Silver Line, several MBTA bus lines, the Red Line subway, Amtrak service, commuter rail service and passenger bus service. In order to meet projected future demand from the South Coast, Worcester and the I-495 area, and the Fairmount Line, the number of tracks and bays available for commuter rail and Amtrak must be increased. Though a lovely building, South Station is not fully accessible under the Americans with Disability Act. It is time for MassDOT to make South Station fully accessible. Lastly, the potential opportunity to develop air rights above South Station, in harmony with the City of Boston, is the opportunity to promote continued economic growth and development in Downtown Boston. MassDOT is to be commended for its efforts thus far. As well, I wish to reiterate that I remain willing to assist MassDOT in any appropriate way with regard to moving forward in acquiring the United States Postal Service property on Dorchester Avenue.

In general, my thoughts and comments for SSX are entirely supportive. However, there are several issues for which I would like to underscore their importance. 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 on-site, and I encourage MassDOT to address it appropriately. Given South Station's proximity to surface water, I cannot stress enough the need to account for future rise in sea level and the impact of a storm surge. Finally, I appreciate that the facilities, including passenger amenities, at

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South Station are inadequate. However, as MassDOT continues its planning, I strongly suggest that South Station retain its classic rail station look and feel. 9.3

The transportation merits of SSX are plain and I do not feel I need to restate them here. However, there are several transportation issues which I suggest MassDOT address. First is siting the layover facility. I appreciate that adequate layover space is a necessity. However, 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. I am also 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? 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. Lastly, 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. 9.4 9.5 9.6 9.7

In closing, I would again like to re-state my support for South Station Expansion. I believe that the SSX, when completed, will address unmet public transit needs in the Commonwealth and spur economic growth in Downtown Boston. I appreciate the opportunity to offer my thoughts on how MassDOT should proceed with the South Station Expansion project.

Sincerely,

Michael E. Capuano  
Member of Congress