

Johnson, Holly (EEA)

From: Rosenberry, John H (HOU) [john.rosenberry@mahouse.gov]
Sent: Wednesday, December 24, 2014 12:00 PM
To: Johnson, Holly (EEA)
Subject: RE: ssx comment
Attachments: SSX Commentary.docx

Hi Holly,

Per our conversation, attached is commentary from Mr. Garballey of Arlington.

Best,

John H. Rosenberry
 Legislative Aide
 Office of Representative Sean Garballey
 State House, Room 540
 Boston, MA 02133
 Tel: (617) 722-2090
 Fax: (617) 722-2848
<mailto:john.rosenberry@mahouse.gov>

From: Johnson, Holly S (ENV) [<mailto:holly.s.johnson@massmail.state.ma.us>]
Sent: Wednesday, December 24, 2014 11:59 AM
To: Rosenberry, John (HOU)
Subject: ssx comment

Holly Johnson
 Policy and Program Analyst, MEPA Office
 Executive Office of Energy and Environmental Affairs
 100 Cambridge Street, Suite 900 | Boston, MA 02114
 ☎: 617-626-1023 | 📠: 617-626-1181 | ✉ holly.s.johnson@state.ma.us

MEPA Office
Attn.: Holly Johnson, EEA #15028
100 Cambridge St., Suite 900
Boston, MA 02114

Dear Secretary Bartlett,

I am writing to you today to echo the sentiments of Representative Frank Smizik of Brookline regarding the South Station Expansion Project. I am strongly in support of the North-South Rail Link Project, and believe that any project which curtails its completion would not be to the best interest to the people of the Commonwealth. Below, please see Mr. Smizik's commentary, humbly submitted for your consideration.

As the largest multimodal transportation hub in Greater Boston, South Station is a critical part of intracity and regional transportation. While acknowledging some key needs in the state's transportation infrastructure, the SSX makes the future creation of a North-South Rail Link, a more comprehensive and significant project, implausible. The Commonwealth would be best served by a project which improves South Station but also completes the North-South Rail Link. Such a project will stimulate economic development, reduce greenhouse gas emissions, and provide access to safe and efficient transportation modes.

The North-South Rail Link alone will remove 55,000 cars from the road each day. If this project is completed in addition to improvements at South Station, the potential is great for significant reduction in motor vehicle use, roadway congestion, and GHG emissions from the transportation sector, the largest greenhouse gas producer in the state. At nearly 30 million metric tons of carbon dioxide equivalents each year the transportation sector emits nearly 40 percent of the state's total emissions annually. Personal vehicle use accounts for nearly 60 percent of these transportation emissions. This is a result of Massachusetts residents driving over 10 percent more miles today (800 miles per year) than they did 20 years ago, and carpooling less than the national average (9 percent of MA residents versus 12 percent of U.S. residents). The North-South Rail link is the best option for the state to reduce emissions from this sector by creating a new travel paradigm, and a safer and more efficient mass transit system.

The rail link and South Station improvements should also reduce both GHG emissions and total energy use in all phases of design and construction. Massachusetts has been the nation's most energy efficient state for 4 years, according to the American Council for an Energy-Efficient Economy. Leadership in energy efficiency is something we take great pride in. 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 Authorities Climate Checklist, and adhere to the state's stretch energy code standard. Additionally, as a project located close to Boston's waterfront, 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. Climate preparedness is lacking in the current SSX

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proposal. Recent designs for the North-South Rail Link take this into much great consideration. These efforts, in addition to promoting mass transit use and healthy transportation alternatives, will ensure that we improve public health and the transportation system while simultaneously mitigating and adapting to climate change.

Improving the Commonwealth's transportation infrastructure helps improve the state's economy, as the two are inextricably linked. South and North Station are major stops for Amtrak and the Commuter rail, as well as several of the MBTA's transit lines. Both stations are essential passenger destinations for members of the workforce who travel to and from Boston each day, as well as passengers traveling regionally along the Northeast Corridor. Currently there is a gap in the Northeast corridor between North and South Station. This gap requires passengers traveling along these lines to disembark from their trains at North or South Station and travel the one miles gap via either the MBTA or cab to the subsequent station. This break represents a major deficiency in Boston's regional transportation system; connecting these two transit hubs is essential and represents an opportunity to increase performance. Doing so will increase growth and success of the Down-easter service from New Hampshire and Maine, service to New York and Washington D.C., and travel west to Worcester and Fitchburg.

The Northeast Corridor is home to 51 million people responsible for generating 1/5th of the nation's Gross Domestic Product. As Massachusetts' economic competitiveness, business climate, and tourism industry depends on our transportation infrastructure, a connection to this corridor is essential. Completion of this North-South Rail Link will cement this connection and will help to create jobs and bolster our economy by ensuring safe and functional transportation throughout the state and region. This will undoubtedly benefit the residents of the Commonwealth and the region.

A project of the North-South Rail Link's magnitude has the potential to help stimulate economic activity, reduce GHG emissions and pollution, and provide greater accessibility to goods, jobs, and services for citizens throughout Massachusetts. By investing in our public transportation system our economy, society, and environment all stand to benefit. We strongly suggest that the Executive Office of Energy and Environmental Affairs, and the new Administration take this significant opportunity to transform the future of transportation in the region, and repair the damage done from a generation of underfunding, by choosing the North-South Rail Link as a crucial part of any South Station Expansion.



The Commonwealth of Massachusetts

HOUSE OF REPRESENTATIVES
STATE HOUSE, BOSTON 02133-1054

FRANK I. SMIZIK
15TH NORFOLK DISTRICT
ROOM 274, STATE HOUSE

TEL (617) 722-2676

E-MAIL: Rep.FrankSmizik@hou.state.ma.us

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DEC 23 2014

MEPA

CHAIRMAN
House Committee on:
Global Warming and Climate Change

MEPA Office

Attn.: Holly Johnson, EEA #15028

100-Cambridge St., Suite 900

Boston, MA 02114

Dear Secretary Bartlett,

I am writing you today to discuss the South Station Expansion Project (SSX) and recently released Draft Environmental Impact Report. As the largest multimodal transportation hub in Greater Boston, South Station is a critical part of intracity and regional transportation. While acknowledging some key needs in the state's transportation infrastructure, the SSX makes the future creation of a North-South Rail Link, a more comprehensive and significant project, implausible. The Commonwealth would be best served by a project which improves South Station but also completes the North-South Rail Link. Such a project will stimulate economic development, reduce greenhouse gas emissions, and provide access to safe and efficient transportation modes.

The North-South Rail Link alone will remove 55,000 cars from the road each day. If this project is completed in addition to improvements at South Station, the potential is great for significant reduction in motor vehicle use, roadway congestion, and GHG emissions from the transportation sector, the largest greenhouse gas producer in the state. At nearly 30 million metric tons of carbon dioxide equivalents each year the transportation sector emits nearly 40 percent of the state's total emissions annually. Personal vehicle use accounts for nearly 60 percent of these transportation emissions. This is a result of Massachusetts residents driving over 10 percent more miles today (800 miles per year) than they did 20 years ago, and carpooling less than the national average (9 percent of MA residents versus 12 percent of U.S. residents). The North-South Rail link is the best option for the state to reduce emissions from this sector by creating a new travel paradigm, and a safer and more efficient mass transit system.

The rail link and South Station improvements should also reduce both GHG emissions and total energy use in all phases of design and construction. Massachusetts has been the nation's most energy efficient state for 4 years, according to the American Council for an Energy-Efficient Economy. Leadership in energy efficiency is something we take great pride in. 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 Authorities Climate Checklist, and adhere to the state's stretch energy code standard. Additionally, as a project located close to Boston's waterfront, 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. Climate preparedness is lacking in the current SSX proposal. Recent designs for the North-South Rail Link take this into much great

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11.2

consideration. These efforts, in addition to promoting mass transit use and healthy transportation alternatives, will ensure that we improve public health and the transportation system while simultaneously mitigating and adapting to climate change.

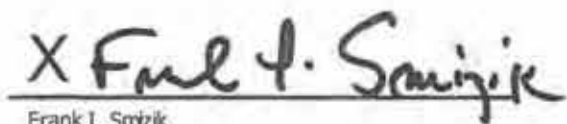
Improving the Commonwealth's transportation infrastructure helps improve the state's economy, as the two are inextricably linked. South and North Station are major stops for Amtrak and the Commuter rail, as well as several of the MBTA's transit lines. Both stations are essential passenger destinations for members of the workforce who travel to and from Boston each day, as well as passengers traveling regionally along the Northeast Corridor. Currently there is a gap in the Northeast corridor between North and South Station. This gap requires passengers traveling along these lines to disembark from their trains at North or South Station and travel the one miles gap via either the MBTA or cab to the subsequent station. This break represents a major deficiency in Boston's regional transportation system; connecting these two transit hubs is essential and represents an opportunity to increase performance. Doing so will increase growth and success of the Down-easter service from New Hampshire and Maine, service to New York and Washington D.C., and travel west to Worcester and Fitchburg.

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A project of the North-South Rail Link's magnitude has the potential to help stimulate economic activity, reduce GHG emissions and pollution, and provide greater accessibility to goods, jobs, and services for citizens throughout Massachusetts. By investing in our public transportation system our economy, society, and environment all stand to benefit. I strongly suggest that the Executive Office of Energy and Environmental Affairs, and the new Administration take this significant opportunity to transform the future of transportation in the region, and repair the damage done from a generation of underfunding, by choosing the North-South Rail Link as a crucial part of any South Station Expansion.

Thank you for taking the time to read these comments, if you have any further questions please contact my office.

Sincerely,

A handwritten signature in black ink that reads "X Frank I. Smizik". The signature is written in a cursive, slightly stylized font. The "X" is at the beginning, followed by "Frank I. Smizik".

Frank I. Smizik
15 Norfolk



SENATOR BRUCE E. TARR
 MINORITY LEADER
First Essex and Middlesex

The Commonwealth of Massachusetts
MASSACHUSETTS SENATE
 OFFICE OF THE MINORITY LEADER

STATE HOUSE, ROOM 308
 BOSTON, MA 02133-1053
 TEL. (617) 722-1600
 FAX: (617) 722-1310
 BRUCE.TARR@MASENATE.GOV
 WWW.MASENATE.GOV

December 23, 2014

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

Dear Secretary Bartlett:

I am writing to comment on the Draft Environmental Impact Report that was recently released regarding the South Station Expansion Project – EEA #15028.

I am aware of many compelling reasons to support connecting North Station and South Station via a Rail Link. Connecting these two stations will not only help to address the capacity issues at both stations, but will also minimize traffic congestion, reduce pollution and ease the commute for North Shore residents. Because of the importance of connecting these two stations, I believe it would be imprudent to initiate other actions that would preclude this goal from being accomplished.

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Thank you in advance for your consideration of my request. Please feel free to contact me if I may be of any additional assistance to you and your staff during your deliberations on this matter.

Sincerely,

Bruce Tarr
 State Senator

Boston University Senior Vice President for Operations

One Silber Way
 Boston, Massachusetts 02215
 T 617-353-6500 F 617-353-6556
 www.bu.edu



December 24, 2014

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

Re: South Station Expansion Project Draft Environmental Impact Report (EOEEA#15028)

Dear Secretary Bartlett,

Boston University has reviewed the above referenced Draft Environmental Impact Report (DEIR) submitted on October 31, 2014 and appreciates the opportunity to provide comments on this critical project. The benefits of the South Station Expansion (SSX) project are long-term and regional in nature. The successful implementation of the SSX project will significantly enhance the terminal capacity and operations of this vital regional transportation hub.

This project also has the potential to directly affect Boston University as a result of the large proposed layover facilities at Beacon Park Yard (BPY) in Allston, Massachusetts. Boston University has approximately 5,000 students living in close proximity to the proposed layover facilities and shares concerns with its neighbors in Allston and Brookline about the impact that this large industrial facility may have on this growing residential neighborhood. In this regard, Boston University has four major concerns summarized below and detailed in the following pages:

- 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 may have on Boston University and the adjoining neighborhoods.
- These issues need to be addressed in the South Station Expansion Final Environmental Impact Report (FEIR) rather than the Allston I-90 Interchange MEPA filings lest they "fall between the cracks."

1. Alternatives Locations to the BPY Site

Studies undertaken for the SSX project identified the current deficit of layover capacity affecting the operations of the MBTA fleet, specifically during the daytime, off-peak hours. Currently, layover capacity for 28 train sets is needed, though there is only space available for 22 train sets. The study also quantified anticipated layover needs for future operations, noting that by the year 2040 layover space for 49 train sets will be required, resulting in a potential deficit of 21 train sets. In the DEIR, a combination of facilities at BPY, Widett Circle, and Readville Yard 2 are proposed to satisfy these deficits. Yet, it would appear that the entire deficit for the system would be located in Allston, instead of distributing the impacts among several sites. Located to the west of South Station and with space adequate to accommodate 20 eight-car train sets, BPY was identified in the DEIR as a "preferred location." It is not at all clear from the analysis provided that the "preferred alternative" minimizes damage to the environment and is a better solution than a combination of three sites.

Under the "No-Build" alternative described in the DEIR it is stated that an "agreement in principal" has been reached between Harvard University, the current owner of BPY, and MassDOT to use approximately 22 of the available 30 acres of the site for a new commuter rail layover and maintenance facility and a rail station. Boston University requests that MassDOT address the following:

- Please indicate why facilities at BPY are included in the "No-Build" condition while facilities at Widett Circle would be eliminated. A "No-Build" alternative which includes the construction of a 20 train set layover facility is hardly a no-build alternative.
- Please provide an explanation of how each of the four layover alternatives presented in the DEIR will affect the scale and scope of the proposed layover facility at BPY.
- The DEIR indicates that a phasing plan for the potential layover facilities at Widett Circle and Readville Yard 2 will be discussed in the FEIR. Please indicate whether the BPY site will employ a phased approach and how/if that approach will correlate to the final plans for the SSX project.

2. Understated Uses of Layover Facility

Although the layover facility at BPY is proposed as a solution to layover capacity deficits, the Allston I-90 Interchange project indicates a variety of heavy maintenance facilities will be associated with the layover facilities at the BPY site, including wheel truing, car wash, maintenance facilities, and a pit track. These uses were not described in the SSX DEIR and are inconsistent with the stated needs described in the DEIR for increased layover capacity and light maintenance. In addition, impacts from the layover facilities have been described as minor, however the proposed uses at BPY have the potential to create significant, on-going impacts to the surrounding community. A layover and maintenance facility of this magnitude places heavy industrial uses adjacent to one of the main residential areas of the Boston University campus and portions of the residential neighborhood in Allston.

Contrary to the assertion on page 4-4 of the DEIR that "Per Article 51 of the *Boston Zoning Code*, Allston-Brighton Neighborhood District, a rail freight terminal and accessory railroad storage yard are

approved uses without restrictions within the Allston Landing South EDA," the Allston Landing South EDA provides specific performance standards for such uses in Section 51-25. This section of the zoning code states that "the following effects shall not be allowed from any use within an EDA: 1. Any emission of any air, water, or other pollutants or of radiation or any release of toxic or biohazardous material in violation of federal, state, or local regulations. 2. Any noise, air pollutant, vibration, dust, odor, change of temperature, or direct glare of lighting, which emanates more than fifty (50) feet beyond the boundaries of the lot upon which the use is located (or more than twenty (20) feet if the abutting lot into which such emanation occurs is within a Residential Subdistrict), is detectable at such distance by human senses without aid of instruments, and is of sufficient quantity or duration to cause significant annoyance or interference with normal activities." It is a gross simplification to state that a layover facility is an allowed use without restrictions. The analysis in the DEIR does not demonstrate compliance with these local zoning standards and the FEIR should provide the additional analysis necessary to make this demonstration.

3. Appropriate Environmental Report Documentation

It is proposed that environmental impacts associated with the layover facility at BPY are to be considered as a "no-build" alternative and that they be described in the environmental documents associated with the Allston I-90 Interchange project, for which an Environmental Notification Form (ENF) was submitted to the Executive Office of Energy and Environmental Affairs on October 31, 2014. However, the SSX project and the proposed layover facilities at BPY are inextricably linked, as the capacity which may or may not be developed at BPY relates to the overall capacity needed to support expanded South Station operations. Therefore, Boston University requests that the Final Environmental Impact Report (FEIR) for the SSX project continue to address the impacts of the BPY layover facility.

The continued study of current and future MBTA layover capacity needs is well outside the scope of the Allston I-90 Interchange project, as is the continued coordination effort required to conceive of and construct layover facilities at the three proposed locations. As the fundamental components and preliminary layout of the BPY facility were determined by the SSX project, Boston University requests that MassDOT address the following in the FEIR:

- Describe how the results of any further study of the SSX project will be reflected in changes to the proposed layover facilities at BPY and other locations. If changes to the SSX project will not influence the plans for the BPY layover facility, indicate why.
- Please provide an explanation of how MassDOT's ability to acquire the necessary property and overcome the environmental challenges associated with Widett Circle and Readville Yard 2 will affect the proposed facility at BPY. The FEIR should indicate how any difficulties at other proposed layover sites will impact plans for BPY and conversely, how any reduction in planned capacity at BPY would affect plans for Widett Circle and Readville Yard 2.
- The FEIR should outline the process by which changes to the SSX project with impacts to layover facilities will be adequately vetted through a public forum that will explicitly solicit the feedback

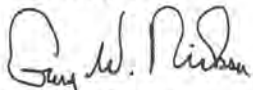
of residents, businesses, and stakeholders affected by the BPY layover facilities who may not be aware of the SSX project.

4. Significance and Compatibility of Potential Impacts and the Surrounding Community

Boston University remains concerned about the compatibility of the proposed layover uses with the surrounding neighborhood. Use of layover tracks for 20 train sets along with the heavy maintenance operations planned for BPY may result in significant impacts to abutters. The University requests that MassDOT fully describe and assess the noise, vibration and air quality impacts of the facility in the FEIR and ensure that all applicable mitigation strategies be developed and described for the BPY site given its proximity to a densely settled residential area.

The SSX project presents an exciting opportunity to expand and improve the operations of one of the country's busiest transportation hubs. While Boston University supports the project, potential impacts of the BPY layover facility to the campus and to the local community in Allston and Brookline could be significant. Boston University appreciates your consideration of these issues and stresses the importance of requiring MassDOT to continue consideration of elements of the BPY layover facility in the FEIR for the SSX project.

Sincerely,



Gary W. Nicksa

Senior Vice President for Operations

HARVARD
OFFICE OF THE EXECUTIVE VICE PRESIDENT



December 18, 2014

Hand Delivery; Receipt Requested

Ms. Maeve Vallely Bartlett
Secretary, Executive Office of Energy and Environmental Affairs
100 Cambridge Street, Suite 900
Boston, MA 02114
Attention: MEPA Office

Re: South Station Expansion Project Draft Environmental Impact Report
EEA No. 15028

Dear Secretary Bartlett:

On behalf of the Presidents and Fellows of Harvard University, I am submitting comments on the South Station Expansion Project Draft Environmental Impact Report (DEIR) filed by the Massachusetts Department of Transportation (MassDOT). Our Environmental Notification Form (ENF) comments focused on the proposed use of Harvard-owned land in Beacon Park Yard as a commuter rail layover facility. We were particularly concerned that this proposal needed to be assessed within the larger context of the reconstruction of the I-90 Allston interchange and the construction of a new West Station intermodal center.

As noted on pages 1-7 of the DEIR, MassDOT has decided to continue its review of Harvard's Beacon Park Yard land as the potential site for a new commuter rail layup/layover facility, as part of the I-90 Allston Interchange project. MassDOT has filed an Environmental Notification Form for I-90 Allston Interchange project (EEA #15278) concurrently with the South Station Expansion Project DEIR. The I-90 Allston Interchange ENF reflects a project that includes the reconfiguration of the interchange, the construction of West Station, and the creation of a new rail yard for the mid-day layup/layover of MBTA commuter rail trains.

MassDOT proposes to continue its review of the potential rail layup/layover facility at Beacon Park Yard as part of the environmental review for the I-90 Allston Interchange project (EOEA #15278). Harvard has submitted a December 15th comment letter about the Allston Interchange ENF to MEPA, including comments on issues related to the rail yard. Harvard remains interested in the continued analysis of MBTA's future service and layup/layover needs as they may relate to the program and parameters of the layup/layover facility proposed as part of the I-90 interchange multi-modal project. Therefore, 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

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OFFICE OF THE EXECUTIVE VICE PRESIDENT



needs (whether through existing rail lines or new lines) and future layup/layover needs. Ideally, this data and related analysis would be discussed in detail in the DEIR being prepared for the I-90 Allston Interchange project as well. Similarly, 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 I-90 Allston Interchange project. 14.2

We look forward to working with MassDOT, public officials and agencies, the Allston Interchange Task Force, our neighbors, and other stakeholders on the continued progress of that important project.

Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read 'Katherine N. Lapp'.

Katherine N. Lapp
Executive Vice President

cc: David Mohler, MassDOT (*By email*)
James Cerbone, MassDOT (*By email*)

24 December 2014

Secretary Maeve Vallely Bartlett
Executive Office of Energy and Environmental Affairs
100 Cambridge Street, Suite 900
Boston, MA 02114
ATT: MEPA Office

RE: EOE No. 15028- Draft Environmental Impact Report
South Station Expansion Project, Boston

Dear Secretary Bartlett:

The Boston Harbor Association, a non-profit, public interest organization founded in 1973 by the League of Women Voters and the Boston Shipping Association, has been closely following the proposed South Station Expansion Project. Proposed by MassDOT, the project is designed to expand Boston's South Station terminal capacity and related layover capacity to meet current and future high-speed, intercity, and commuter rail service needs (page 1-1 of Draft Environmental Impact Report).

As such, the project consists of five elements:

- Expand South Station Terminal by adding seven tracks and four new platforms, for a total of 20 tracks and 11 platforms. The existing head house would expand from 210,000 sq. ft. to 400,000 sq.ft., with a larger waiting area, amenities such as retail and food outlets, and better circulation;
- Acquire and demolish existing U.S. Postal Service General Mail Facility along the Fort Point Channel;
- Construct rail layover facilities;
- Reopen Dorchester Avenue and extend the HarborWalk;
- Provide public-private development opportunities to enliven area between Atlantic Avenue and Fort Point Channel.

Four alternatives were considered in the Environmental Notification Form, and are further evaluated in the Draft EIR:

- No Build Alternative (baseline);
- Alternative 1- Transportation Improvements Only;
- Alternative 2- Joint/Private Development Minimum Build
- Alternative 3- Joint/Private Development Maximum Build.

In response to TBHA and others' comments, the Secretary's Certificate on the Environmental Notification Form required the proponent to demonstrate that the number of parking spaces has been reduced to the maximum extent practicable and to look at the

potential impacts of the proposed alternatives on the public realm. The proponent has done so, and made significant changes accordingly.

The Boston Harbor Association strongly supports the Commonwealth's efforts to expand intermodal transportation capacities at South Station. Since the issuance of the Secretary's 2013 Certificate on the Environmental Notification Form, the draft 2014 South Boston Transportation Plan has further reinforced the importance of a robust transportation network for growth of the South Boston Innovation District. Our comments follow:

Permitting Process: Neither the Environmental Notification Form (ENF) nor the Draft Environmental Impact Report (DEIR) identify a preferred alternative. Alternative 1, Transportation Improvements Only, includes not only the expansion of South Station Terminal, but also acquisition and demolition of the U.S. Postal Service facility on Dorchester Avenue, construction of a HarborWalk on a re-opened Dorchester Avenue, and off-site rail layover facilities. Alternative 2 assumes Alternative 1, plus potential public-private development that complies with state and city regulations such as Chapter 91 regulations and the Fort Point Downtown Municipal Harbor Planning Area requirements. Alternative 3 assumes Alternative 1, plus potential public-private development that would only be limited by FAA maximum height limits and would require an amendment to the Municipal Harbor Plan in order to allow substitutions to Chapter 91 standards.

For planning purposes, Alternative 3 is the Maximum Build alternative, and provides "worst case" analysis of localized impacts. Consistent with our suggestions on the ENF, we are very supportive of the changes made to Alternative 3 since issuance of the ENF: the building size has been reduced from the original 2.5 million sq. ft. to a maximum 2 million sq. ft., and the parking has been reduced from the original proposal of 1,370 spaces to a maximum of 506 parking spaces, which is more consistent with a multi-modal mass transit facility. Similar reductions have been proposed for Alternative 2, which we also strongly support.

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. We were very impressed during a 17 December 2014 presentation by MassDOT staff to our Harbor Use Committee of proposed improvements for cyclists and pedestrians at South Station under the three alternatives. While much would stay the same under the "No Build" alternative, there seem to be opportunities to improve pedestrian flow and bicycle usage and storage that could occur even in the existing facility.

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Consistency with Boston's Fort Point Channel Watersheet Activation Plan: The Boston Redevelopment Authority's 2002 Fort Point Channel Watersheet Activation Plan calls for activation of the Seawall Basin of Fort Point Channel, which includes the project site. We strongly commend the project proponent for agreeing to open Dorchester Avenue to the public, providing ADA-compliant sidewalk on the western side of Dorchester Avenue, providing the first-ever HarborWalk segment along Dorchester Avenue, and

providing a 15-foot wide cycle track on Dorchester Avenue. These measures are consistent with the goals of the Activation Plan.

We ask that the Secretary's Certificate also request the proponent to 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. Postal Service (page 27 of BRA Watersheet Activation Plan).

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Given potential changes likely to the Old Northern Avenue Bridge in the next few years as well as advances in state-of-the-art boat designs, we ask that the Secretary's Certificate require all three alternatives to further examine the possibility of water transportation to the South Station area.

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Waterways and Tidelands Impacts and Permits: Alternative 3, Maximum Build alternative, will require a Municipal Harbor Plan Amendment. It is not clear from the DEIR the timetable for convening a Municipal Harbor Plan Advisory Group. We ask that the proponent provide a schedule for the beginning of the Amendment process. Currently, a Municipal Harbor Planning process underway in the Downtown Waterfront area would suggest at least 16-18 months of preparation will be necessary before submission of a proposed Municipal Harbor Plan Amendment to the MA Office of Coastal Zone Planning.

Climate Resilient Project: MassDOT, with state funding as well as federal support from the Federal Highway Administration, has been pro-active in studying ways to make their projects more climate-resilient.

Chapter 5 of the DEIR provides an analysis of the potential impacts of sea level rise and storm surge on the project site. The analysis states in part: "In the absence of mitigation, the 100-year floodplain would encompass approximately 38 acres of the SSX project footprint, representing nearly complete inundation of the site and infrastructure, during a 100-year flood event" (page 5-18 of DEIR). The mitigation measures include elevating power/HVAC sources, relocating critical systems to higher levels, raising the base level of the site, and designing infrastructure and critical equipment to accommodate seawater flooding.

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.

15.4

Thank you for your consideration.

Sincerely,

Vivien Li
President
The Boston Harbor Association



www.northeasthsr.org

www.aptmarp.org

Association for Public Transportation
Northeast High Speed Rail Association
Massachusetts Association of Railroad Passengers

P.O. Box 51029
 Boston, MA 02205-1029

apt@aptmarp.org

Richard J. Arena
 President

rjarena@aptmarp.org
 Tel: 732.576.8840 Fax: 732.576.8839

23 December 2014

Secretary Maeve Valley Bartlett
 Commonwealth of Massachusetts
 Executive Office of Energy and Environmental Affairs, MEPA Office, EEA # 15028
 Attention: Holly Johnson, MEPA Analyst
 100 Cambridge Street, Suite 900
 Boston, MA 02114

Re: South Station Expansion (SSX) Plans
 Via e-mail & fax: Fax: 617-626-1181 Email: Holly.S.Johnson@state.ma.us

Dear Secretary Bartlett:

A key term that arises when discussing the funding and construction of strategic transportation infrastructure is **SUSTAINABILITY**. Under that encompassing term are other project questions:

- Is the project economically, technically, and operationally sound?
- Are life cycle costs as well as construction costs comprehended for this once in a century investment?
- Does it utilize best-in-class, peer-reviewed methodologies?
- Does this project symbiotically make the other transportation pieces in the Megaregion perform better?
- Does the project maximize its environmental improvement potential?

When the \$850 million South Station Expansion (SSX) project is looked at under this microscope, it is found to be sadly deficient. The most disconcerting issue is that South Station is not a station at all - it is a stub-end terminal, constrained by the Charles River to its north and Boston Harbor to its east. As a stub terminal, it loses half of its peak capacity as precious time slots must be apportioned to bring full trains out and empty trains in, and vice versa. There is no ability to expand the service north to the population and business areas north of Boston and in New Hampshire and southern Maine. The proposed SSX plan would increase the operational inefficiencies in both the MBTA commuter rail network and Amtrak intercity rail which are forced to run bifurcated systems out of both North and South Stations in Boston.

Around the world, much thought has been given to making train stations attractive, accessible, successful, and efficient. Planners and architects have realized that the most successful stations have the tracks and platforms below grade. The very important ground level is best used for retail (shops, restaurants, other services). These shops attract foot traffic which makes the station not just a transportation mecca; it is also a popular destination. The rents, fees, and taxes generated by the ground level and lower floor shops contribute to covering the operating costs of the station. But without shops on the ground floor, the appeal is gone, as are the benefits of Value Capture Financing.

The Association for Public Transportation (APT) would propose **replacing the current SSX plan with the North/South Rail Link (NSRL) which, via underground tunnels and station platforms, will connect the two separate Boston terminals and likewise connect the region.** True High Speed Rail (HSR) is coming to Boston, but it will be inconvenient for those living north of Boston or in southern NH. It will be easier, quicker, and more convenient for them to fly to other cities on the Northeast Corridor (NEC) rather than take the train – it is simply too cumbersome to transfer from North Station to South Station or to drive to the Boston or Route 128 Westwood HSR stations. The NSRL and a Woburn (Anderson) HSR station north of Boston address that issue nicely, conveniently, and cost-effectively.

Another point to consider is the capacity situation of the Greater Boston MBTA subway. Many key stations, such as Park St., Downtown Crossing, Government Center, and State Street are at or near capacity. This is in part due to commuter rail riders who, due to the split MBTA commuter rail system, have to detrain on the wrong side of the city. To get to their eventual destination, they use the subway, and traverse the downtown core. The NSRL would alleviate this problem by permitting commuters to get closer to their eventual destination without necessarily requiring them to tie up capacity at downtown subway stations.

The bottom line is the SSX project cannot be looked at in a vacuum. It is a critical component of federal plans for a true HSR Northeast Corridor which will feature high-speed train sets operating at 160 mph average speed, with a 220+ mph top speed. The trains will be time and cost competitive with air travel in distances between 200 and 600 miles. South Station, with connections to points north via the NSRL, will be as transformative to the 21st Century regional economy as Logan Airport was to the 20th Century. With the construction of a true high speed backbone rail corridor from Boston to Washington DC, coupled with higher speed connections (110 mph) to other important Massachusetts cities, the changes are dramatic. **Boston would be within 90 minutes of New York, two hours of key Massachusetts cities, and three hours of southern core cities in New Hampshire, Maine and Vermont, as well as Washington, DC by HSR.**

From an environmental standpoint, the SSX project is especially lacking versus the NSRL alternative. Per the North/South Rail Link MIS/DEIS, the NSRL project would:

- Eliminate 55,000 car trips daily and save commuters over 50,000 hours daily
- Eliminate 1 million vehicle miles traveled on the regional highway system in a typical weekday,
- **PREVENT the EMISSION of OVER 580 TONS of GREENHOUSE GAS DAILY**

No other transportation project in the Commonwealth grades out this highly in terms of environmental benefit.

Madam Secretary, APT formally requests that you find the SSX proposal as submitted by the Commonwealth inconclusive and incomplete in that it does not review the substantial benefits of the NSRL. We would further request that you direct MassDOT to appropriate the funding to complete the preliminary engineering of the NSRL, following up the \$4.5 million initial study funded by the federal government. APT submits that this is not just good practice, it is a legal requirement. Language in the NSRL MIS/DEIS stated that the proposed right of way for the Rail Link was not to be obstructed by any other development. It is distinctly possible that proposed development at South Station and the South Postal Annex will make constructing the NSRL impossible. The Commonwealth's commuters, businesses, citizens, tax payers, and fare payers deserve better than the incomplete and deficient SSX plan currently proposed.

Sincerely,



Richard J. Arena
President, Association for Public Transportation

C: Honorable Charles Baker, Governor-elect, Commonwealth of Massachusetts
Acting Secretary Frank DePaola, MassDOT CEO
Ms. Rebecca Reyes-Alicea, US Department of Transportation

New Boston Food Market

Development Corporation

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

RE: EEA # 15028

Dear Secretary Bartlett:

We are writing to comment on the South Station Expansion (SSX) Draft Environmental Impact Report (DEIR), specifically regarding the use of Widett Circle as one of the layover facility sites for South Station.

Currently, Widett Circle is home to our cooperative corporation, New Boston Food Market (NBFM). The 21 businesses in our co-op are in the food service and food processing industry, providing over 700 individuals with valuable manufacturing jobs in the City of Boston. Widett Circle is the perfect location for these thriving businesses, which service the many restaurants, grocers and food suppliers in Boston and Massachusetts. Access to the highways for our hundreds of refrigerated trucks, which serve our customers, is absolutely imperative to the success of our businesses. Our collective businesses at Widett Circle are expected nearly \$1 billion in revenues in 2014 and we believe that our current home is crucial to our successful operation. We know of no other site in the City of Boston that can provide such access to highways, public transportation and the space that our co-op requires.

We have had the opportunity to meet with officials from the MBTA real estate division regarding their long-range plans on the SSX and understand that Widett Circle may be used to park trains that will be connected to electrical connections that will eliminate the need to idle diesel locomotives. We respect the need of the Authority and that it has been seeking for some time additional layover space to accommodate the expansion.

In 2013 we engaged in constructive conversations regarding a three-acre parcel adjacent to, but not owned by, NBFM, and were agreeable to a proposed taking that would allow the MBTA to efficiently layover several trains. We appreciated the MBTA's forthright approach to those conversations, and still prefer that possible use to a proposal for a materials transfer station put forward by a private developer that is wholly incompatible with our businesses.

However, at this time, NBFM cannot support a much broader use of Widett Circle as one of the layover sites included in the SSX until we are made comfortable that the future of the 21 businesses and 700

15 Widett Circle, Boston, Massachusetts 02118
Telephone: (617) 268-8743 Fax: (617) 268-8330
Email: NBFMDC@aol.com