

Fidelity Real Estate Company

currently provided. No alternative has been suggested that we are aware of. Additionally, we have been informed that "all truck maneuvering would occur off street." We ask the project to provide clarification and inform us how our existing delivery requirements will be met without impacting the surrounding environment.

24.3

Ground Water

We are very concerned what impacts the proposed changes will have to ground or salt water. It is unclear in the documents that a study has been completed regarding this topic. 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.

24.4

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

Regards,

Vice President



Mailing Address: 200 Seaport Blvd., Z1L Boston. MA 02210 Office Location: World Trade Center, Lower Level Boston, MA 02110

LAWSON & WEITZEN, LLP

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December 22, 2014

VIA OVERNIGHT MAIL AND EMAIL

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: Boston South Station Expansion Project EEA #15028

Dear Secretary Bartlett:

James G. Grant Co., LLC ("Grant") has reviewed the October 2014 Draft Environmental Impact Report ("DEIR") submitted by the Massachusetts Department of Transportation ("MassDOT") concerning the above-referenced matter, and offers these comments concerning the proposed layover facility at Readville - Yard 2. Grant requests that the issues identified below be addressed by MassDOT before the project moves forward.

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

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

LAWSON & WEITZEN. LLP Secretary Maeve Vallely Barlett

December 22, 2014

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

<u>The Readville – Yard 2 Layover Will Have A Direct Negative Impact On</u> Long Term Employment In The Community As Well As Related Environmental Impacts

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

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

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

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

LAWSON & WEITZEN, LLP Secretary Macve Vallely Bartlett

December 22, 2014

Ultimately, should the property by taken and Grant curtail its operations, Grant will be forced to downsize or eliminate its employee force. Such a business curtailment would have farreaching environmental ramifications across the region. While the DEIR states that no long term loss of employment will occur, this analysis is quite flawed and should be studied more thoroughly.

The Proposed Readville – Yard 2 Layover Site Will Cause Significant Negative Impacts To The Community

The proposed Readville – Yard 2 Layover site is located nearly 9 track miles from South Station at the southernmost point of the city, the farthest of any of the proposed layover sites. Trains utilizing the layover facility would travel the farthest of any of the proposed sites, emitting pollution – including noise pollution ~ for a far longer journey and through more communities than other proposed layover facilities. This longer trip will also cause more wear and tear on the trains at issue. Further, additional lengthy "deadheading" will occur in order for the quantities and locations of trains and employees to reach equilibrium, having an adverse impact on the traversed communities as well as employees.

Moreover, the Readville - Yard 2 layover site can accommodate the fewest eight-car 25.2 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. At the very least, because the layover site can accommodate the fewest trains, there will be more train traffic at the Readville – Yard 2 layover facility. 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 lavover site is located in close proximity to a single-family residential district zone. This single family residential area will bear the brunt of the impacts of the proposed layover.

The DEIR Has Identified Many Unknown Factors Relating To The Readville – Yard 2 Site That Must Be Further Studied

According to the DEIR, there remain many unknown factors with respect to the proposed Readville - Yard 2 layover site that should be further studied prior to any decision being made. Importantly, while the DEIR correctly states that the Readville – Yard 2 site contains wetlands areas, no determination has yet been made as to whether or not the wetlands are protected jurisdictional areas necessitating further permitting and design work. The DEIR states that more delineation and assessment work must be conducted in order to determine whether or not certain wetlands areas fall within the scope of the Massachusetts Wetlands Protection Act. Similarly, the site lies within the 100-foot buffer zone and 25-foot riverfront area as defined in the Massachusetts Wetlands Protection Act and associated regulations. The proposed project must be designed to conform to performance standards contained in the Massachusetts Wetlands Protection Act and its associated regulations, where applicable. These issues have not been addressed by the DEIR. Further study should be conducted at this time in order to obtain

LAWSON & WEITZEN, LLP Secretary Maeve Vallely Bartlett

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necessary data to define the extensive wetlands permitting that may be required to develop a layover at this site. At this time, the proposed project cannot be properly evaluated due to the lack of data concerning wetlands and riverfront issues.

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

Similarly, according to the DEIR, the age, condition, and size of several water pipes and sewer pipes servicing Readville – Yard 2 are unknown. Design elements and mitigation factors 29 will depend upon the conditions of these services, and should be studied further at this time.

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

<u>The Proposed Readville - Yard 2 Layover Site Will</u> <u>Have Negative Environmental Consequences That Have Not Been Fully Addressed</u>

The proposed Readville – Yard 2 Layover site has numerous environmental issues that necessitate further study. There is currently an open Release Tracking Number ("RTN") pursuant to the Massachusetts Contingency Plan related to the site. Therefore, according to the DEIR, construction on the site would require both a Licensed Site Professional and a soil management plan until such time as a permanent solution is reached with respect to the open RTN. The impacts of these environmental issues have not been fully addressed by the DEIR. 25.7

Further, 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.

It is clear that air quality impacts, in the form of noise pollution and other air pollution, will occur as the result of utilizing the site as a layover facility. The Readville – Yard 2 layover site would generate noise that would exceed FTA moderate impact criterion, necessitating further study and installation of noise barriers. Similarly, the layover facility would create further regulated air emissions, particularly in light of additional traffic generated by the distant location of the proposed site. The neighborhood in the immediate vicinity will bear the brunt of these impacts. Traffic will also increase in the area, negatively impacting the neighborhood including the single family residential district.

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LAWSON & WEITZEN. LLP Secretary Macve Vallety Bartlett

December 22, 2014

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.

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

Sincerely yours, George F. Hailer



December 23, 2014

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

RE: DEIR regarding South Station Expansion Project – EEA No. 15028

Dear Secretary Bartlett:

I am writing in support of Michael Dukakis's recent letter to you in respect to the South Station Expansion Project. I agree with Governor Dukakis that the report is flawed and should be rejected. Most important, 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.

Again, as Governor Dukakis pointed out, 160 out of 200 Massachusetts legislators have endorsed the North South rail link and voted for funds to complete the preliminary planning. We must proceed with the North-South Rail Link.

Sincerely,

When

Robert L. Beal

RLB:dah

cc: Michael S. Dukakis

Brad Bellows Architects 87 Howard Street Cambridge MA 02139 tel: 617.661.4500

December 24, 2014

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

Dear Secretary Bartlett,

While I commend the Patrick Administration's stated interest in expanding rail capacity, it is very clear that current plans for the expansion of surface tracks at South Station represent a major blow to the kind of efficient and integrated rail infrastructure we desperately need.

According to the DEIS itself (section 2.3.1), the key issue at South Station is that "every arriving train *must be reversed to either leave the station as a new revenue trip, or to access a layover facility. This means that every arriving trip is linked to a departing trip, further limiting station capacity.*" It is more than obvious from this succinct summary that adding a few more tracks will do nothing to address this core problem. On the contrary, enlarging a stub-end terminal simply multiplies the inefficiency, and transfers additional acres of valuable downtown land to railroad uses – 7.6 acres more at South Station alone. The same inefficiencies that are choking South Station also loom at North Station. Are we to expend similar sums expanding stub-end service at North Station as well, only to face the same crises, just a few years hence, at both?

There is no doubt that additional rail capacity is urgently needed, but the only sensible, effective, and durable way to provide it is to replace inherently inefficient stub-end service with the kind of run-through service we take for granted on our rapid transit lines. That this most obvious solution was not included in the SSX DEIS is nothing short of astonishing. 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.

If adding a few more surface tracks were inexpensive, and bought us a few years to organize a more definitive solution, then perhaps it could be justified. But, with a price tag now approaching a billion dollars, the SSX will severely undermine our ability to make more enlightened investments in the same location. Even more concerning than the financial implications are the structural conflicts the SSX threatens to place in the path of both of the currently identified Rail Link alignments. 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 - the very antithesis of the enlightened planning that has done so much to make Boston and the Commonwealth great, and a poor legacy for the officials responsible.

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There is a misconception in some quarters that the Rail Link was studied and found to be infeasible. In fact, several groups of senior engineers and project managers with broad international experience who evaluated the project in the early and mid-nineties, came to the opposite conclusion: that the project was technically feasible, and could be built at reasonable cost. That these recommendations were ignored says more about the panic that accompanied burgeoning CAT/P cost overruns, and the inability of the sponsoring agency (the MBTA) to contemplate any significant capital investments, than it does about the virtues or feasibility of the NSRL Project. In fact, the Rail Link needs to be seen and funded not as a Boston project, or even a Massachusetts project (though of course both will be the greatest beneficiaries of it), but rather as national and New England-wide project, extending Northeast Corridor service to the north of Boston, into Maine, New Hampshire and Vermont.

Before we now take the definitive step to massively invest in a stopgap that fails to address our long term local and regional needs, we owe it to ourselves and our partners to make sure we are not precluding a better and more cost-effective solution. At minimum, a proper cost / benefit analysis of a North South Rail² Link needs to be completed, giving due credit for the savings of not having to expand South Station, for the surface land no longer required for rail uses, and for the operating savings of a run-through system, all of which were excluded from prior reviews – not to mention the regional economic benefits and joint development opportunities.

Until such a cost / benefit analysis has been done, as it should have been done in the SSX DEIS, it is premature and even negligent to commit public funds to any alternative that provides significantly fewer benefits and precludes better solutions. Now that the true cost of adding surface platforms at South Station has been established, the advantages of an underground link will only be more compelling.

In recognition of this, the Massachusetts Legislature included \$2 Million in the 2014 Transportation Bond Bill for the completion and updating of prior North South Rail Link analyses. We have a new Mayor in Boston, and will shortly have a new Governor. I strongly urge the Secretary and Governor Patrick to refrain from any steps that will compromise the realization of integrated rail service in Massachusetts, as current expansion plans at South Station appear certain to do.

Respectfully,

Bondley S Bellar

Brad Bellows Architect Member Citizens Advisory Committee for the North South Rail Link, 1996-2003 Member, Central Artery Task Force, 1993 While I commend Governor Patrick for recognizing the vital role that improved commuter rail service must play if we are to create sustainable economic growth, I regret that the current plan for South Station expansion will, if implemented, ultimately compromise this goal. Yes, the expansion of surface tracks will address a very real and immediate capacity issue, and allow modest increases in rail service, but those surface tracks and additional platforms would not be needed if our rail service were properly integrated, with run-through service, just as they are not needed in our rapid transit stations that serve far more people.

Large parking lots for trains are an obsolete artifact of the piecemeal way in which our rail system was built, by private companies, each serving a specific market, with no regard for regional integration. We inherited this system and have not improved it in a hundred years. Expanding South Station may restore part of what we have allowed to actually erode, but it certainly will not give us the twenty-first century system we need. If a short term expansion was inexpensive, and bought us a few years to organize a more definitive solution linking North and South Stations, then it might be quite justified. But, with a price tag approaching a billion dollars, the SSX project clearly represents the final nail in the coffin of any such plans, assuring that we never have the rail service we need. Sometimes "the perfect is the enemy of the good", but in this case, a shortsighted solution is the enemy of the necessary.

A bold transportation plan should turn the clock forward, not back to the nineteenth century, as this plan proposes to do. The North South Rail Link Project, studied in the late 1990's and early 2000's, under the shadow of ballooning CAT/P costs, would reduce the need for surface platforms at

both South and North Stations, while lowering operating costs and dramatically improving service. By the relatively simple act of linking the assets we already own, it would give us, in one stroke, one of the premier regional rail systems in the world, allowing our commuter rail service to operate much like a rapid transit system, making the greater Boston region vastly more accessible for employers and workers across the region, who are currently suffering the costs of gridlock and will receive only limited relief under the current SSX plan.

There is a widely held misconception that the Rail Link was studied and found to be impractical, on either technical or economic grounds, or perhaps both. In fact, a Peer Review committee, convened in the mid-1990's, composed of senior engineers and project managers with broad international experience, concluded the opposite: that the project was eminently feasible, and could be built at reasonable cost. That this recommendation was ignored says more about the panic that accompanied CAT/P cost overruns, and the inability of the sponsoring agency (the MBTA) to contemplate any significant capital investments, than it does about the virtues or feasibility of the NSRL Project. In fact, the Rail Link needs to be seen and funded not as a Boston project, or even a Massachusetts project (though of course both will be the greatest beneficiaries of it), but rather as national and New England-wide project, extending Northeast Corridor service to the north of Boston, into Maine, New Hampshire and Vermont. Had Governor Romney taken the lead in forging a regional rail coalition, we might have had a "shovel-ready" project when Stimulus funds were being disbursed a few years ago - but unfortunately this did not occur.

Before we now take the definitive step to massively invest in a short-term solution to our long-term needs, we owe it to ourselves to make sure we are not precluding a better and more cost-effective solution. At minimum, this should include a proper Cost / Benefit analysis of the North South Rail Link Project - something that was never actually done. Rather, NSRL costs were escalated by layers of "escalation factors", while most of the undisputed benefits were never quantified, even when it would have been relatively easy to do so. The cost of South Station expansion, for example, was discussed, but not included as a cost of the No-Build Option. The NSRL cost estimates are also significantly at odds with other rail projects in the US and around the world. Are we prepared to concede that Massachusetts cannot accomplish what our competitors can? NSRL cost estimates should be verified against current global "best-practices".

Until a proper Cost / Benefit analysis has been done, it is highly irresponsible to commit public funds to any alternative plan that provides significantly fewer benefits. Now that the true cost of adding surface platforms at South Station has been established, the advantages of an underground link will only be more compelling. The time has come to cut our Gordian Knot, not enlarge it.

Johnson, Holly (EEA)

From: Sent: To: Subject: Adam Castiglioni [acastigl_99@yahoo.com] Wednesday, December 24, 2014 11:31 AM Johnson, Holly (EEA) South Station expansion

Dear Ms. Johnson,

I would like to go on record in support of the South Station Expansion project.

I feel it is critical to expanding commuter rail, intercity rail service via Amtrak, and expanding the economy of Boston. I would love to see faster high speed rail to NYC and points south as well as expanded public transit here in Boston.

Thank you.

Sincerely,

Adam Castiglioni

Check out my blog:

http://www.bostonhospitalityindustry.com/

Follow me on Twitter: @Conciergeboston

Johnson, Holly (EEA)

From: Sent: To: Subject: Attachments: Frank S. DeMasi [fsdemasi@verizon.net] Monday, December 22, 2014 6:12 PM Johnson, Holly (EEA) Comments on south station DEIR South Sta DEIR.pdf

Dear Holly,

At the attachment find my comments on the south station DEIR.

Regards,

Fank DeMasi

FRANK S. DE MASI 26 MAC ARTHUR ROAD, WELLESLEY MA 02482

December 22, 2014 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

Dear Secretary Vallely Bartlett Ms Holly Johnson

Thank you for considering my comments on the south station Expansion DEIR. As a member of the Association for Public Transportation, I support the South Station Expansion alternative of a North/South Rail Link. I believe a summary of the findings of the MBTA North South Rail Link Draft EIR/EIS/MIS should be included and considered in the Draft Environmental Impact Report (DEIR) for the south station expansion. I believe MassDOT should not have withdrawn its sponsorship of the project in May 2006, due to its perception that the capital cost (projected at several billion dollars), was prohibitive. The April 2007 document *JOURNEY TO 2030: Transportation Plan of the Boston Region Metropolitan Planning Organization* says "the MPO feels that a study of the right-of-way requirements should be conducted for preservation of that right-of-way so as to not preclude this project's going forward in the future."

In December 2007, the Federal Railroad Administration was interested in funding this project if the Massachusetts Executive Office of Transportation was interested in sponsoring it. As of August 2009, the project was brought back into the spotlight as a component of the New England transportation plan, a coordinated effort by the six New England states to improve rail transportation infrastructure by competing for the \$8 billion dollars allocated for high speed rail in the American Recovery and Reinvestment Act for 2009 indicating strong support exists for this vital link to the NEC and MBTA commuter rail lines. As a result of continuing legislative and public support for the North South Rail link and the positive impact the link would have on mitigating the lack of expansion space for current and future regional and commuter rail track capacity EIR/EIS/MIS should be included and considered in the Draft Environmental Impact Report (DEIR) for the south station expansion.

As a member of the Eastern Massachusetts Freight Rail Coalition I would like to express my concern for the impact revision of interlocking and layover yards south of South Station may have on freight and passenger rail access to the port of Boston. There is growing concern regarding road congestion at the Port of Boston and the new Seaport District. The port has very limited freight rail access as a result of an

FRANK S. DE MASI 26 MAC ARTHUR ROAD, WELLESLEY MA 02482

adverse rail connection at Bay Junction. The Boston Terminal running track that connects to Massport's track 61 requires freight trains of limited length to perform a back-up move to get into the port. The DEIR addresses relocating some of the interlocking at or near Bay junction and the MBTA and Amtrak South Hampton St yards requiring the consideration of critically needed track improvements for freight and passenger rail access to the port. Improvements for train access from the Fairmount line are especially needed coming north, from and across the Braintree Main line, at Bay junction. Direct access to the Boston terminal running track to the port is needed for trains coming south from the Y at South Station and along the reverse loop at Bay Junction. The south station interlocking and lay over yard improvements also provide an opportunity to improve port rail access and this need should be included in the DEIR.

Massport and the city of Boston have submitted Tiger Grants proposed to improve the port rail infrastructure. As many as 6,000 rail carloads a year could be brought into the port for bulk and other kinds of commodities, which would take 24,000 truckloads off our roads. I think it's very important to include in the DEIR provisions for maintaining and improving freight rail access to port at Bay Junction.

The Grand Junction connection to North Station should be considered in the DEIS as a mitigating factor for reducing the number of trains terminating at south station. A number of Inland Route, and MBTA commuter trains should be diverted from the Boston Line to Cambridge and North Station. I know we're going to add possibly 16 trains on the inland route to South Station as a terminus. Being a resident in Metro West, I know many people coming out from Worcester and Metro West would like to go to Cambridge and North Station. With the new West Station coming along and Diesel Multi Units planned for more local commuter trains I believe that a discussion of these initiatives and their positive impact on track capacity should be included in the DEIR. But of course, there will be a tremendous impact in Cambridge and the DEIR should evaluate the impacts as we take advantage of that Grand Junction Line.

Returning to a major concern for the logistics impacts on the port I believe 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 made on its impact on related port operations. Thank you.

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Drank A. Clemini

Frank S., DeMasi 26 MacArthur Road Wellesley, MA 02482

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Johnson, Holly (EEA)

From: Sent: To: Subject: Dukakis, Michael [M.Dukakis@neu.edu] Saturday, December 20, 2014 9:27 PM Johnson, Holly (EEA) Fw: Comments on DEIR regarding South Station Expansion Project- EEA NO. 15028

From: Dukakis, Michael Sent: Saturday, December 20, 2014 8:51 PM To: <u>holly.s.johnson@state.ma.us</u> Subject: Comments on DEIR regarding South Station Expansion Project- EEA NO. 15028

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

Dear Secretary Bartlett:

I am writing with comments with respect to the DEIR recently released regarding the South Station Expansion Project- EEA No. 15028.

Unfortunately, the report is fatally flawed and should be rejected out of hand.

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. Regrettably, that was not done even as the likely cost of the station expansion is now five times its original estimate.

The report makes no mention of the fact that a serious congestion problem is now developing at North Station. Obviously, expanding South Station will have no impact on that problem. Connecting the two stations solves the problem on both ends.

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.

In short, we have spent millions of dollars on a study that fails to consider the most obvious alternative to station expansion: connecting the two stations. Furthermore, the cost estimates for that project on which the Commonwealth continues to rely are patently absurd. Urban rail tunnels are being built all over the world. Their average cost is 900 million dollars a mile. Los Angeles has just awarded the contract for its downtown rail

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connector. It is 1.9 miles long-- substantially longer than the North-South Rail Link. It includes three new stations. The winning bid was slightly in excess of \$1.4 billion dollars.

The DEIR also ignores the fact that the North-South Rail Link will not only fully integrate our commuter rail system and take thousands of cars off the road every day with dramatic improvements in the metropolitan area's air quality. It also ignores the fact that connecting North and South Station by rail will make possible high speed rail service to northern New England and Montreal. Our Canadian neighbors are particularly interested in partnering with us on such service. Expanding South Station fails to achieve any of these goals.

160 out of 200 Massachusetts legislators have now endorsed the North-South Rail Link and voted for substantial funds to complete preliminary planning for the project. Their views are important and should not be ignored.

Michael S. Dukakis

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MEPA



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 Fax: 617-626-1181

Dear Sec. Bartlett:

12/12/2014

I am writing today to ensure that I maintain status as a commenter on DEIR (EEA #15028), so that I am provided every opportunity to receive information and comment in the future.

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.

Thank you,

Steve Hollinger Resident of Fort Point, South Boston 21 Wormwood St. #215 Boston, MA 02210 617 338-2222



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December, 1 2014

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

Re: South Station expansion plans vs a modern rail link

Dear Secretary Bartlett,

I am writing to express my concern over the planning momentum involving the expansion of Boston's South Station. This analysis appears to be progressing with without a sufficient reconsideration of the far more elegant solution of an underground rail connection between North and South stations.

As you are aware, the NSRL has been debated for decades, but it may be even more relevant today than ever before in light of the renewed emphasis on rail emanating from Washington.

The cost & disruption of relocating the Post Office without thoroughly evaluating the potentially more effective approach of connecting our rail infrastructure will be significant, and may be an oversight that we regret long into the future.

As modern tunneling construction technology has become more efficient and widespread, the difference in the investment to build the NSRL versus above ground rail solutions has narrowed.

In my view the entire northeast transportation corridor would sustain broader benefits from connecting 32.1 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.

I urge you to consider the benefits of an underground strategy in your deliberations.

Coleman Hoyt President





Public Hearing - November 18, 2014 Comments on the Draft Environmental Impact Report

Comments on the South Station Expansion project may be submitted by mail, fax, or email until December 24.

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Please provide your comments below (use the reverse side for additional space).

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You may leave this comment sheet with project staff at the door or mail/fax/email it to:

Secretary Maeve Vallely Bartlett, Executive Office of Energy and Environmental Affairs MEPA Office, Attn.: Holly Johnson, MEPA Analyst EEA # 15028 100 Cambridge St., Suite 900 Boston, MA 02114 Fax: 617-626-1181 Email: Holly.S.Johnson@state.ma.us

December 24, 2014

Stephen H. Kaiser 191 Hamilton St. Cambridge Mass. 02139

To: Secretary Maeve Vallely Bartlett Executive Office of Energy and Environmental Affairs 100 Cambridge Street Room 900 Boston, Mass. 02114 Attention Holly S. Johnson

From : Stephen H. Kaiser, PhD

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Comment on Draft EIR for South Station Expansion (SSX) EEA 15028

The South Station DEIR offers detailed information and justification for the alternatives and focus of the project. My comments shall concentrate on one aspect of the project and its EIR. MassDOT has identified insufficient service capacity for existing and future No-Build conditions, and has implied that the proposed changes at South Station will be sufficient to meet the capacity needs of transportation services in the vicinity of South Station. This presumption must be questioned.

The EIR considers numerous alternatives in terms of several variables : train length, seating capacity, number of bi-level cars, station platform loading limits, and South Station terminal flow-through capacity. All future alternatives must include consideration of both existing concerns with limitations on South Station operations, while also allowing for increases in MBTA and Amtrak ridership. The service challenge is solving both existing problems with operations and future challenges of increased ridership demand.

The EIR concentrates on the Amtrak/commuter rail perspectives, and gives lesser attention to issues outside but adjacent to South Station . These issues include pedestrian circulation to and from South Station (as well as within) and the quality of service and capacity offered by the Red Line and the Silver Line. My concerns are primarily with the Red Line and Silver Lines. My basic question is this : what is the single weakest link in current South Station operations? Is it insufficient platforms? Not enough trains or cars? Is it the present or future Tower 1 Interlocking design? Or is it limits on passenger density on platforms or within the South Station concourse? Is it the shortage of layover space for commuter rail trains? Could longer trains be the answer? Or is it achieving improved on-time performance? Or could the ultimate limit at South Station be the peak hour overcrowding on the Red Line or Silver Line, especially when including intense development planned along the Red Line corridor?

The Draft identifies qualitatively almost all of these problems, but does not give the reader any sense of priority or expected degree of success if the project is completed as planned. The Final EIR should identify the key critical capacity limitations as they exist today, and as they might continue continue in the future with the new designs in place.

For train layover space, the EIR is clear about yard capacity needs for layovers. A more dynamic problem is posed by Tower 1 Interlocking whereby the addition of seven more tracks makes the design of the interlocking system far more challenging. 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?

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. If a train breaks down at a platform, this represents a 5% loss in capacity. If a locomotive quits in the middle of the interlocking area, almost all of the trains and platforms become non-functional until the blockage is removed. What are worst case scenarios which MassDOT hopes to address?

Years ago, I learned that the deficiencies of Tower 1 Interlocking, referred to by knowledgeable old-timers as "Malfunction Junction." I am aware of at least one occurrence in the past several years when a disabled locomotive blocked the key tracks and switches and no trains could get through. 34.1

Will the use of more bi-level cars result in delays loading and unloading, as34.4waiting passengers crowd the platforms near the two entrance doors to each car?Will future Amtrak and commuter rail passengers seeking to continue their tripencounter peak hour congestion and delays on the Red and Silver Lines?34.5

The DEIR text does not provide ready answers to these concerns, although some of the answers may lie deep in the technical appendices. Both the EIR text and appendices need a closer comparison of existing and future conditions at each key congestion or trouble spot. In Appendix 9 for example, Table 5 showed existing conditions based on on-off loading from the platforms, while Tables 13 and 14 reflect conditions inside the cars at the highest load point. There needs to be a Table 5A that gives current estimates of peak load conditions on the train.

Inconsistencies in Amtrak and Commuter Rail forecasts

The data presented on page 2-6 suggests that there would be an increase in Amtrak daily train <u>movements</u> from 72 to 138, or an increase of 92 % over the next 20 years. However, the increase in Amtrak <u>ridership</u> would be only 37 %. Are these numbers correct and do they reflect a proper planning for efficient passenger handling?

Meanwhile, the daily MBTA commuter <u>trains</u> 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.

34.8

Specifics on Red and Silver Line Capacities

In Appendix 9 of the DEIR on page 26 and 27, 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 Red Line peak load point shows a V/C ratio of 0.59 for northbound service approaching South Station in the morning peak hour. Southbound service would peak out at a V/C ratio of 0.33, which implies that the trains are only one-third full in the peak hour.

These results reflect future no-build conditions where added riders are included, but there are no physical changes. In other words, the existing conditions are that the V/C ratios are <u>less than 0.59 and 0.32</u>, but there is no data in the DEIR to tell us how much. Both numbers are implausible under any circumstance, because the Red Line is running today a rather frustrating mixture of half-empty trains and cars that are jammed to the gills. Headways on the Red Line in the peak hour vary from two minutes to seventeen minutes, and all sense that trains should be running "on-time" has been completely lost.

The problems on page 27 extend to the Orange Line, with jammed conditions at Sullivan Square in the morning, yet MassDOT shows the trains as half full (or half empty) with a V/C of 0.48. The inbound Green Line in the morning is shown with a V/C ratio of 0.50 - again half empty or half full. How can these figures so lacking in credibility be explained?

The opposite conditions occurs for the Silver Line, where Routes 4 and 5 are shown with V/C ratios of 1.81. This means that the ridership volume is almost twice as much as available capacity. Again, these results are lacking in credibility.

For commuter rail, in the 2035 No Build AM peak, six lines would have V/C ratios of less than 0.40, and only three would be more. What justification could there be to seeking longer or higher capacity trains?

Regrettably, there have been few submissions to MEPA in past years that considered the capacity abilities of mass transit, especially the subways. The only one I could find was for the 2002 DEIR for North Point (EEA #12650, Table 3.4.8, page 3-31, Transportation). For this assessment, then existing V/C ratios for the Red Line were in the range of 0.50 to 0.53. Again, a Red Line that is half-empty/half-full.

My ultimate concern is that if all of the proposed changes at South Station work well and all expectations are met, the limiting factor will be the Red Line and its inadequate practical capacity. The SSX program could still be conceived as a positive step towards meeting existing needs, and also providing a boost to transit capabilities to deal with future conditions such as a possible 2024 Olympics in Boston.