

Regrettably, I have seen no one in the public or private sector (except for one private developer) who has perceived either the need or the ability to achieve efficiency and capacity improvements to the Red Line, either with existing equipment, or with new equipment replacing the old, or with additional trains and operators willing to do what the City of Chicago already does - which is operate subway trains on 90-second headways (three times as frequently as trains are now scheduled on the Red Line).

Even more remarkable is that back in 1926 the Boston Elevated Company operated trains on what we today call the Red Line, and did so with 90 second headways.

Sincerely,

A handwritten signature in cursive script that reads "Stephen H. Kaiser".

Stephen H. Kaiser, PhD

Kenneth J. Krause
50 Mystic Street Medford, MA 02155
781-396-0920 kenneth.krause@comcast.net

December 24, 2014

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

Dear Ms. Bartlett,

Thank you for the opportunity to comment on the Draft Environmental Impact Form (DEIR) for the South Station Expansion project, EEA #15028, dated October 31, 2014.

Many aspects of the project outlined in the DEIR are commendable, particularly from an environmental standpoint. These include providing more public transit service to decrease the population's reliance on automobiles; better intermodal connectivity, vehicular circulation, and reduced congestion; improving the conditions and connectivity for bicycling and walking near the station, including construction of a cycle track on Dorchester Avenue and an extension of the Harborwalk; restoring Dorchester Avenue in its entirety for public and station access; and improving ADA access; and using sustainable design measures.

However, as welcome as these improvements are, the expansion of the station by a modest seven tracks and two platforms will do little to alleviate the current capacity problems at the station, nor will it address accommodating the extensive proposed future rail service expansion by Amtrak and the MBTA. By itself, it is a project that will leave Boston with a transit hub that is still maxed out almost from the day it re-opens.

This expansion plan would be worth considering were South Station the only rail station in Boston and were there no options for extending the incoming lines from the south. However, there is a better solution to the capacity and congestion problems at South Station that should be wholly integrated into the South Station Expansion plan: the North-South Rail Link (NSRL).

The existence of the NSRL would eliminate many of the problems the multi-billion dollar South Station Expansion project endeavors to try to solve, but clearly will not. If commuter rail and Amtrak trains could pass through South Station to North Station and continue in service north of Boston, the capacity and bottleneaking problems that exist at South Station today would be greatly reduced. There would be no need to keep trains in the station any longer than necessary (or stored on a layover yard elsewhere), freeing the tracks for incoming trains and passengers.

The South Station expansion makes sense only as part of a project that includes the North-South Rail Link. However, there is virtually no mention of the North-South Rail Link in the more than

1,000 pages of the DEIR, despite that fact that your predecessor secretary's certificate on the SSX Expanded Environmental Notification Form stated that the DEIR "should describe how the proposed South Station Expansion Project will be designed to not preclude future construction of the North/South Rail Link project." The only such reference is in regard to an explanation of why ground source heat pumps are not recommended for the project. No information is offered about how the design is being planned with the future North-South Rail Link in mind, nor is any specific detail presented with regard to the location of major infrastructure, including pilings for associated commercial development above the station, and their potential impact on the NSRL. Essentially, there is no evidence in the DEIR of any consideration of the North-South Rail Link, which fall short of satisfying the secretary's certificate.

The Final Environmental Impact Report should be required to provide the specific details in all relevant areas of the project that will ensure that the SSX is being planned with the future North-South Rail Link in mind. This is essential, because once this expansion project is built, there will be no more room for expansion. Future capacity and congestion issues that will assuredly arise will finally force the hand of state transportation officials: it will be obvious – just like it has been to many for years– that there is no better (or other) solution to the South Station capacity problems than to build the North-South Rail Link.

35.1

When that day comes, it will be tragically unfortunate – and monumentally expensive – if the South Station Expansion was not completed without the North-South Rail Link given the highest consideration, as is the case in the DEIR.

Please instruct MassDOT to provide the proper planning and documentation of considerations of the future North-South Rail Link in its Final Environmental Impact Report on the South Station Expansion Project.

Thank you for your consideration.



Ken Krause
50 Mystic Street
Medford, MA 02155
781-396-0920

Johnson, Holly (EEA)

From: Bob La Trémouille [boblat@yahoo.com]
Sent: Tuesday, December 02, 2014 12:28 PM
To: Johnson, Holly (EEA)
Subject: South Station Expansion Project, EEA No. 15028
Attachments: 12-02-14, DEIR Comments.pdf

TO: holly.s.johnson@state.ma.us

RE: South Station Project, EEA No. 15028

Draft Environmental Impact Report
Secretary Maeva Valley Bartlett
Executive Office of Energy and Environmental Affairs
MEPA Office, Attn: Holly Johnson, EEA #15028
100 Cambridge Street, Suite 900
Boston, MA 02114
holly.s.johnson@state.ma.us

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

Madam Secretary / Ms. Johnson:

Enclosed for your processing are my comments on the South Station Expansion Project Draft Environment report.

These comments have considerable overlap with my comments on EEA #15278, the I90 Allston Interchange Project, except that they involve further thinking on the matter.

I anticipate I will supplement EEA #15278 to bring those comments up to date.

Thank you kindly for your consideration and processing.

Robert J. La Trémouille
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Cambridge, MA 02139-3070
617-283-7649

Robert J. La Tremouille

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E-Mail: boblat@yahoo.com

December 2, 2014

Secretary Maeve Valley Bartlett
Executive Office of Energy and Environmental Affairs
MEPA Office, Attn: Holly Johnson, EEA #15028
100 Cambridge Street, Suite 900
Boston, MA 02114
holly.s.johnson@state.ma.us

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

1. Synopsis.
2. Introduction.
3. Limits of the DEIR Analysis.
 - a. Introductory.
 - b. Beacon Yards Layover.
 - c. Project facing Dorchester Avenue.
 - d. Expansion to include a lower level or levels of track space for future expansion.
4. It is segmentation if the analysis does not include passenger traffic in East Cambridge. Highway Conflict.
5. It is segmentation if the analysis does not include passenger traffic in East Cambridge. Increase of existing heartless animal abuse.
6. Summary.

Madame Secretary:

1. Synopsis.

The plans for South Station Expansion are deficient because they do not allow any room for any expansion beyond South Coast rail. There seems to be exactly zero room after that. Alternatives are proposed by me which should be considered.

Similar problems exist at the Beacon Yard layover proposal. My suggestion for improvement should be considered in the analysis..

With the current plans, new commuter train service which should go to South Station will have NO CHOICE but to go over the Grand Junction with major environmental destruction in Cambridge, starting with commuter rail traffic generated by West Station.

Failure to include analysis this totally new passenger route which is forced by the inadequate planning at South Station constitutes segmentation, both for interference with traffic on major Cambridge arteries and for environmental harm and increase of existing heartless animal abuse on the banks of the Charles River. Cambridge and the Department of Conservation are already practicing heartless animal abuse on the banks of the Charles River targeted at long term, valuable and popular resident animals.

Analysis should include the DCR's policy in its "Charles River Master Plan" of killing off or driving away all resident animals on the Charles River Basin.

2. Introduction.

I am writing individually and as chair of Friends of the White Geese, a Massachusetts Non Profit Organization organized in 2001 with the purpose of protecting the environment and animals of the Charles River and related matters.

I myself have two years of on the ground experience in railroad operations. I have, as part of my railroad position, observed freight and passenger railroad operations first hand from Boston almost to Washington, DC. I have major experience in working on transit planning matters in the Boston / Cambridge area over a period of nearly 40 years.

I proposed the Kenmore Crossing on the Urban Ring subway concept five years before it was officially adopted by the MBTA as a recognized alternative route in 1991.

I have major environmental experience. In the last 15 years, this has been on Charles River and related matters. I rather clearly have prevented a mass animal killing in that location.

In the last 40 years I have used my legal training for the benefit of the environment in Cambridge.

I obtained a preliminary injunction on appeal, next to impossible, in a temporarily successful effort to protect from needless destruction one of the best parks in the middle of Cambridge, including more than 20 one hundred year old trees.

I have written more successful zoning changes in Cambridge than any other person not employed by the City of Cambridge, and, in sharp contrast to many changes drafted by the Cambridge Development Department my changes do what I said they would do.

I have used zoning as a tool to force environmental protection on very major parts of the City of Cambridge. My zoning changes have required ground floor open space and more housing on about 85% of Massachusetts Avenue in the area between Harvard and Central Squares and portions of adjacent side streets. My zoning changes allowed fairly large buildings on Mass. Ave. while maintaining environmental protections and protections for neighbors.

The building at the corner of Massachusetts Avenue and Harvard Street in east Harvard Square, formerly known as the Inn at Harvard was one of my big victories. Harvard wanted that building to be 72% larger and built to the sidewalk. The City Council disagreed.

About a block away, I saved the 19th Century building at 10 Mt. Auburn Street, on the corner of Banks and Mt. Auburn Streets from destruction by Harvard. I used fine print in the Cambridge Rent Control Ordinance, and the Cambridge Rent Control Board agreed with me. Saving that building probably was key in the retention of the historical character in this, the Kerry Corner neighborhood with Harvard's expansion in this area since 2000.

The first two blocks north of Harvard Law School were downzoned as a result of the very first petition written by me.

There is a former parking lot between Alewife Station and Route 2 which is being returned to nature as a result of another zoning change I wrote. This is the only meaningful environmental victory in the Alewife area in spite of a Cambridge related group which claims to be protecting Alewife.

And this does not include the non explosive changes.

3. Limits of the DEIR Analysis.

a. Introductory.

I was fully in favor of the South Station Expansion Project until it sunk in that there is no thought whatsoever as to what flexibility exists for future expansion.

In fact, my understanding is that there is no thought of any capability of future expansion of South Station or its holding facilities whatsoever after this project.

It looks to me like the proposal traps our Commonwealth in the same sort of shortsighted thinking which brought railroad transportation into the fifty to sixty year mess which we are now attempting to undo. But after this go round, there may not be an opportunity to undo this mess.

b. Beacon Yards Layover.

My analysis at South Station is another approach to my analysis in EEA #15278, the I90 Allston Interchange Project. The most serious problem in both plans is failure to allow for future expansion.

We do not have the luxury of being unconcerned about future expansion. We have the possibility now to leave room to allow our railroad system to thrive. If we do not take needed action now, we are boxing ourselves into a death of strangulation.

Correction of the artificially created limits on the layovers at Beacon Park can NOW be readily corrected by building layover tracks on both sides of the relocated Mass. Pike, not just on the side away from Cambridge Street, as is proposed in the I90 Allston Interchange Plan and blessed in the South Station Expansion Plan.

This shortsightedness can easily be corrected by inserting a switch in the access track from South Station to the proposed layover yard as that track approaches the proposed layover yard. The track approaches the layover yard under the reconstructed Mass. Pike Viaduct before the Mass. Pike returns to ground level. A switch can readily be inserted before the Mass. Pike returns to ground level so that the switch would give the option that layover trains can go on either side of the relocated ground level Mass. Pike. There is no plan for any public transportation use between the relocated Mass. Pike and Cambridge Street. There is plenty of room to set aside adequate area to allow for future transportation needs.

Please note that my analysis of the I90 Mass. Pike Allston project also proposes a layover yard between this added commuter rail layover area and Cambridge Street. This layover yard would be for a street car Green Line A spur from the existing Green Line B to Harvard Square as described in greater detail in my I90 analysis.

c. Project facing Dorchester Avenue.

The same problem of total lack of future expansion applies to the main project.

I repeatedly hear reasons why greater expansion cannot be done, but it is clear that the limits being artificially imposed on the expansion project are the greatest problem for future South Station expansion.

Part of the unthinking limits problem, as it was 50 or 60 years ago, is the application of non railroad priorities ahead of railroad priorities in spite of the very great reality that the places where railroad expansion can be placed is under very severe limits, whereas the alternate uses do not have that very real limit.

This defective thinking applies strongly to that portion of the project facing Dorchester Avenue.

Certainly Boston needs housing, and certainly it is a lovely location for housing, BUT there are other locations for housing. There are pretty much no other locations to expand South Station capacity.

Addition of one or more tracks in the area facing Dorchester Avenue should be seriously considered. Perhaps the housing could be placed above the added tracks. A higher location for housing certainly would be inferior for housing, but this is a matter of life or death for future South Station expansion.

36.1

I am told there is a choke point problem in the entrance to South Station with regard to adding tracks next to Dorchester Avenue. I not aware of any meaningful analysis of the choke point. Have I missed something? At minimum, such an analysis should be presented.

36.2

d. Expansion to include a lower level or levels of track space for future expansion.

A lower level or levels of track space is being proposed by the North-South rail people. Their idea could be a solution to the limits being imposed on South Station Expansion, with or without North-South rail.

Definitely, building 7 tracks at the same level as the current facility, plus building room under the 7 tracks for an additional expansion in the future sounds like an excellent way to get around the crunch point problem, if the crunch point at the entrance to the current South Station facility is a true and absolute limit on expansion at the current level.

Of course, the construction for access to the lower level IN THE FUTURE would be a lot more expensive than the current access cost for new tracks into the 7 proposed tracks.

But we are talking about a station which currently has 13 tracks being expanded to 20 tracks with no future expansion, as opposed to expanding to 20 or 22 tracks now with the possibility of 27 to 31 tracks in the future.

Creating a lower level could include expansion under Dorchester Avenue for the lower level. 2 tracks under Dorchester Avenue could combine with such larger lower and main levels as can be constructed at this time.

With the mail facility moved and Dorchester Avenue not yet reconnected to South Boston / Dorchester, construction under Dorchester Avenue would be readily feasible. Could that bring a possible lower level to 11 tracks with 9 tracks on the current level?

Can the expansion project build under tracks 11, 12 and 13 and others for future expansion? Why not include that in the analysis as well? Perhaps doing it in phases. Build toward Dorchester Avenue first, and let those new tracks temporarily replace 11, 12, and 13. Could a lower level be created under all the existing tracks, working in stages? There is no such analysis in the submittal.

36.3

An excellent example in the South Station complex of such planning for the future is the parking garage on top of the bus facility. That is obviously intended as a location of future expansion of bus service.

Why not use underground expansion in the future for parking in the short run as in the bus facility?

36.4

Why restrict underground expansion possibilities to one level, with parking until need and money exists? Can more underground levels be constructed with corresponding future track expansion, and interim use for parking..

This is not being studied and it should be.

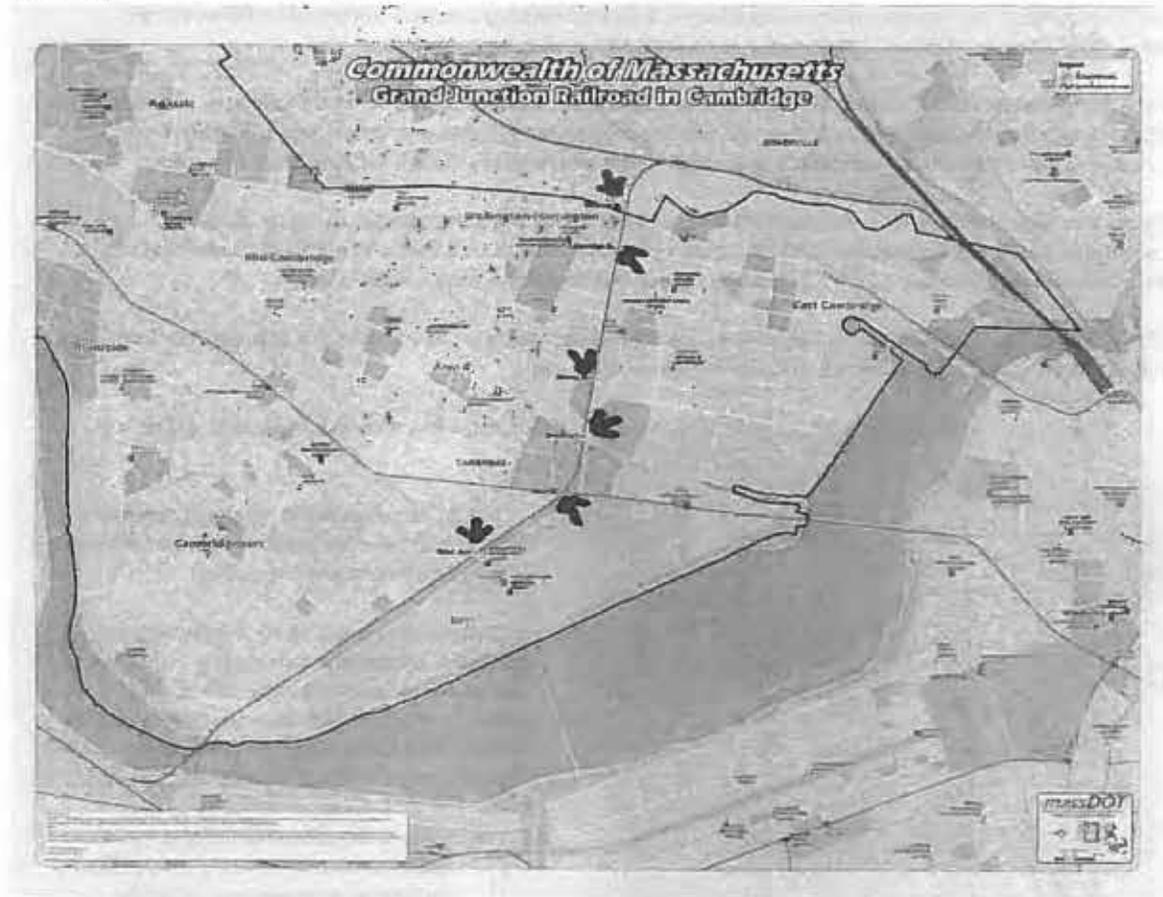
Is it necessary or even sensible to create an artificial limit on future expansion of South Station?

4. It is segmentation if the analysis does not include passenger traffic in East Cambridge. Highway Conflict.

Below is MassDOT's map of the Grand Junction railroad in Cambridge taken from an MIT submittal. I have added thick markings of intersection conflict with existing road traffic.

As stated in my I90 Allston analysis, where will West Station trains go? Why guarantee an environmental nightmare in the eastern part of Cambridge for trains which sensibly should go to South Station?

And the reality is that, given the obvious forcing of use of East Cambridge for future expansion, it looks like failure to include impact of future expansion on East Cambridge would not only be segmentation, but would be dishonest.



There was great hostility to expanding commuter rail to East Cambridge the last time it was proposed. MassDOT's analysis indicated that Grand Junction commuter rail use would have no value except for Kendall Square. There has been no communication of what looks like a certain proposal to put West Station commuter trains on the Grand Junction. Such lack of communication is dishonest.

Especially since creating underground facilities at South Station are obvious alternatives now, and there is no mention that the South Station expansion project as proposed will prevent future expansion and mandate use of the Grand Junction for West Station and other future expansion.

5. It is segmentation if the analysis does not include passenger traffic in East Cambridge. Increase of existing heartless animal abuse.

In addition to the highway conflicts, there would be very real environmental conflicts and the ramping up of existing deliberate heartless animal abuse on the Charles River:

The portion of the banks of the Charles River abutting the Grand Junction on both sides of the Grand Junction is animal habitat. It includes animals of long term residence on the Charles River. In spite of a decade of outrageous misbehavior by Cambridge, the DCR and their friends, many resident animals continue to exist.

Of particular importance is the valuable popular gaggle of the Charles River White Geese who have resided on the Charles River for 34 years and have established a strong community readily admired by all familiar with them. The vibrancy of this free community is an ideal subject for scholastic study.

Their biggest problem of the Charles River White Geese is vile treatment and abuse by Cambridge and the DCR. The Charles River White Geese are, once again without mentioning it, being heartlessly and deliberately starved by Cambridge and the DCR taking their long term food at the Magazine Beach playing fields from them.

Cambridge's map of the area is attached. This is yet another environmental attack on the animal habitat. Cambridge is considering building in the Destroyed Nesting Area of the Charles River White Geese and placing a fence following the railroad tracks blocking access between the two animal habitat areas.

The area which is animal habitat is bounded by the BU Boathouse on the north and the BU Bridge on the south, and by the hashed line to the left and the Charles River to the right.



Option 2: Trail with Bus Rapid Tr
Section 1: Charles River to Ft. Washington

This outrage has been achieved through flat out lying.

- a. The DCR manager has repeatedly promised "no harm" to the Charles River White Geese while deliberately starving them.
- b. Their food at the Magazine Beach playing fields has been taken from them with bizarre introduced bushes walling off the Magazine Beach playing fields from the Charles River. This outrage has been achieved through multiple lies and lies of omission:
 - (1) Never mentioned is the goal in the sanctified Charles River Master Plan to kill or drive away all resident animals on the Charles River Basin. This vile goal in itself should be addressed in any environmental analysis.
 - (2) The key DCR manager has spent ten years or more lying of no intent to harm them. This flat out lie was included in the Boston Globe article

on the start of deliberate starvation by a quotation next to a photo of a massive earth mover next to a tiny confused resident.

- (3) The promise at the Magazine beach playing fields was a lawn to the river. So the DCR and Cambridge simply ignored the promise, and rewrote the supposedly sacrosanct Master Plan to comport to their lies of omission.
- (4) The DCR has contempt for bordering vegetation. They, twice a year, destroyed all bordering vegetation on the Charles River basin, and claim incompetence for the bizarre wall.
- (5) As many other projects as is conceivable includes heartless attacks on the residential animals supposedly incidental to the other projects.
- (6) The DCR repeatedly and loudly has proclaimed an intent to restrict the banks of the Charles River to river related activities. The starvation wall makes the Magazine Beach playing fields totally separated from the Charles River. They might as well be five miles inland.
- (7) Multiple other projects are in the works attacking resident animals while keeping the attacks secret.
- (8) Fake groups associated with the City of Cambridge function as company unions to achieve Cambridge and the DCR's destruction by keeping concerned folk busy chasing their tails. And, in reality, too many supposedly transportation groups / protective groups are similarly influenced.
- (9) Cambridge commonly lies about supposed sainthood through loud initiatives which have no relation or minimal relation to their community which, in reality, serve no purpose other than to convince the voters that heartless animal abusers are the opposite. Excellent examples of this hypocrisy is
 - (a) The repeated yelling at Circus owners for their abuse of animals while
 - (b) Keeping Cambridge deliberate starving of the Charles River White Geese and other heartless abuse (Alewife in particular) as secret as they can get away with, and
 - (c) Flat out lies that a government which is heavily involved in Charles River destruction and international relations has no business concerning itself with Charles River destruction.

The situation on the Charles River is an outrage. Sneaking through more destruction through secret aspects to the South Station Expansion and the I90 Allston Interchange project fits a reprehensible pattern.

MassDOT has rejected more obvious attacks on the Charles River by rejecting proposals for highway construction over the Grand Junction bridge.

MassDOT is a responsible agency. The same cannot be said for Cambridge, the DCR and their friends. These dishonest entities should not be rewarded with destruction unavoidable after their maneuvering, but very real if you realize what is really involved in the South Station Expansion and I90 Allston Interchange project.

6. Summary.

The proposal is generally excellent.

It strikes me as silly to artificially restrict future South Station expansion when we have seen the railroads destroyed 50 to 60 years ago as a result of devaluing these excellent source of transportation.

Robert J. La Trémouille
South Station Expansion Project

Page 8

Review should be made of allowing for further expansion using South Station after the South Coast project is in operation.

Why prevent further expansion of South Station after the currently planned expansion of trains into South Station?

And why allow unavoidable "side effects" to be rammed through in secret?

Thank you for your kind consideration.

In particular, I am strongly impressed with the professionalism of both MassDOT teams, here and in the 190 Allston Interchange project. I have seen praiseworthy examples of MassDOT standing up to environmental outrages stemming from the City of Cambridge and the DCR, especially through unidentified but very truly influenced "private" individuals.

My favorable impression of MassDOT is strikingly different from my impression of Cambridge and the DCR.

Sincerely,

Robert J. La Trémouille

Johnson, Holly (EEA)

From: Katherine Meyer [meyergroupkgm@yahoo.com]
Sent: Monday, November 24, 2014 11:44 AM
To: Johnson, Holly (EEA)
Subject: South Station enlargement DEIR, EEA#15028

To: MEPA
 Re: South Station enlargement DEIR, EEA#15028
 Date: November 24, 2014

To Whom It May Concern:

The South Station enlargement is the right direction for MA transportation planning to go. I support it, if:

1. The North South link possibility is not cut off by this work. 37.1
2. The rail connection to the Port is kept and improved. 37.2

The subsequent development plan for buildings needs to include residences. The number of residents and office workers must be carefully calculated. Overcrowding is to be avoided. Also, the rent for retail, etc. should be estimated conservatively. The figures for rent and vacancies for Union Station (D) should be studied. 37.3

Sincerely yours,
 Katherine Green Meyer
 326 A Street, 4B
 Boston, Massachusetts 02210-1722

Johnson, Holly (EEA)

From: Gerry Pieri [gerrypieri@verizon.net]
Sent: Wednesday, December 24, 2014 8:57 PM
To: Johnson, Holly (EEA)
Subject: Issues with South Station Proposal

Hi, Holly,

I am Gerry Pieri, the former Assistant Secretary of Transportation and Director of Rail Operations for MassDot.

I Have a number of objections to the draft EIS for South Station.. The most important of which is the lack of provisions for a surface Red Line terminal at South Station.

A fatal flaw:

The proposed station design completely stops a decades-old plan which would quadruple (perhaps more) the capacity of MBTA's Red Line.

The proposed design is an absolute failure to provide for the long-planned need to provide surface transportation of the Red Line into South Station.

Thus, the opportunity to increase the Red Line's capacity at least four-fold will be lost forever.

This cannot happen.

We must allow space for a 4-track Red Line station (with two platforms) on the second level above tracks 15 through 18 along including space for a robust interlocking. (Two tracks will not work.)

This goes back to the 1969 MBTA Master Plan which indicated that a surface route from Columbia Junction was a necessity adjunct to the expansion to the South Shore (then Quincy, now Braintree).

Indeed, the current configuration of Columbia Junction provides for trains from either Ashmont, or Braintree to switch to either the Subway or the surface tracks to South Station without any cross-over moves.

And, the two-track right of way from Columbia Junction to the Red Line yards just south of South Station is designed and constructed to enable efficient surface service to South Station.

With the surface extension of the Red Line, (and with a coordination of dispatching times) the capacity of the Red Line increases at least four-fold (perhaps more with a choice of rolling stock); run times (especially to Alewife) are decreased; and the riders experience a substantially more consistent interval between trains.

All of this is lost if we do not reserve the space for a future Red Line terminal on the second level of the station.

The potential benefits are great, and the cost is trivial.

Subject: [Illegible]
Date: [Illegible]



This email has been checked for viruses by Avast antivirus software.

www.avast.com

Response

of

Gerry Pieri

**(Former Massachusetts Assistant Secretary of
Transportation)**

and

(Former Massachusetts Director of Rail Operations)

to the

Draft Environmental Report

South Station Expansion Project

EEA No 15028

Topics

A fatal flaw: Failure to provide for the long-planned need to provide surface transportation of the Red Line into South Station

The absolute need for Widett Circle as the principal layover facility

Widett Circle can handle all of the MBTA's commuter rail storage needs in Boston

Significant opportunities for the air rights development of Widett Circle

Track configuration issues at South Station

Opportunity to resolve trackside environmental issues at the existing bus terminal

Opportunity to improve distribution of South Station riders to their eventual destinations.

A fatal flaw:

The proposed station design completely stops a decades-old plan which would triple (perhaps quadruple) the capacity of MBTA's Red Line.

The proposed design is an absolute failure to provide for the long-planned need to provide surface transportation of the Red Line into South Station.

Thus the opportunity to increase the Red Line's capacity at least four-fold will be lost forever.

This cannot happen.

We must allow space for a 4-track Red Line station (with two platforms) on the second level above tracks 15 through 18 along including space for a robust interlocking. (Two tracks will not work.) 38.1

This goes back to the 1969 MBTA Master Plan which indicated that a surface route from Columbia Junction was a necessity adjunct to the expansion to the South Shore (then Quincy, now Braintree).

Indeed, the current configuration of Columbia Junction provides for trains from either Ashmont, or Braintree to switch to either the Subway or the surface tracks to South Station without any cross-over moves.

And, the two-track right of way from Columbia Junction to the Red Line yards just south of South Station is designed and constructed to enable efficient surface service to South Station.

With the surface extension of the Red Line, (and with a coordination of dispatching times) the capacity of the Red Line increases at least four-fold (perhaps more with a choice of rolling stock); run times (especially to Alewife) are decreased; and the riders experience a substantially more consistent interval between trains.

All of this is lost if we do not reserve the space for a future Red Line terminal on the second level of the station.

The potential benefits are great, and the cost is trivial.

The absolute need for Widett Circle as the principal layover facility

Widett Circle is the only remaining viable opportunity for mid-day (and overnight) storage of MBTA train-sets.

All other viable opportunities have been lost due to previous development decisions (most of which represent a far better land use than a rail storage facility):

- Storage in South Boston at the area formerly known as the “Commonwealth Flats” is no longer possible due to the development of the Convention Center and related development including the “Innovation District”,
- The traditional storage location at (and near the Fan Pier) is no longer possible due to the development of the Federal Courthouse and surrounding facilities,
- Previous storage tracks (just south of South Station) were lost four decades ago when the MBTA Red Line “Cabot” storage and maintenance facility was created thereby enabling substantial land-use improvements between Harvard Square and the nearby Charles River.

The current land use at Widett Circle is no longer efficient or environmentally appropriate in today’s transportation environment:

- Historically, the Widett Circle land was used by the New Haven Railroad as a place to transload rail dependent commodities to local trucks for distribution. This made a lot of sense when the commodities were shipped by box car on The New Haven (from the Pennsylvania Railroad via the New York City car floats or from a host of other railroads via the Poughkeepsie Bridge and the “Maybrook Gateway”).
- Today, the car floats are all-but-gone, the Poughkeepsie Bridge is closed to rail traffic, and no freight moves into the Boston area via the traditional New Haven route (the “Northeast Corridor”).
- The creation of PennCentral, and, later, the creation of Conrail diverted the rail traffic. Also, the transition of goods shipment patterns from box car to intermodal have essentially eliminated the rail-dependent traffic to the current occupants of Widett Circle.
- What little, if any, rail freight moves into Widett Circle can (and should) easily be accommodated elsewhere. Several potential locations exist.

Widett Circle is an ideal location:

- It is less than one mile from South Station.
- Movements to and from South Station can be made without interfering with revenue train operations.
- The location is very convenient for crew purposes.

On the contrary, the current storage of train-sets at Readville completely violates environmental and operational goals:

38.2

- It involves nearly a 9-mile move (twice a day) for each stored train-set – using energy, creating emissions, and creating operational conflicts with revenue trains.
- The Readville facility traditionally has been a source of displeasure to – and opposition from -- its neighbors (in what is essentially a residential neighborhood).
- The location provides almost no options for crew members who are expected to lay-over at the site.

Likewise, the Beacon Park layover site creates environmental and operational issues:

- The site involves a 6-mile from South Station move (twice a day) for each stored train-set – using energy, creating emissions, and creating operational conflicts with revenue trains.
- The track between South Station and Beacon Park is already congested with revenue traffic including the time-consuming low platform station at Back Bay.
- There is a substantial future demand for additional revenue traffic on the track involved which is already congested to the point where scheduling of needed additional peak-hour Framingham and Worcester trains is nearly impossible.
- The location provides limited options for crew members who are expected to lay-over at the site.

Widett Circle is the ideal layover site. No other site is viable.

Widett Circle can handle all of the MBTA's commuter rail storage needs in Boston

The DEIR correctly states that currently, there is a perceived need for 49 layover tracks for South-Side commuter rail trains.

The DEIR also correctly states that Widett Circle may only be able to provide 28 tracks.

However, the apparent discrepancy of 21 tracks is really not an issue:

- Already, there are at least 15 other tracks available to the MBTA in the Southampton area.
- There are substantial opportunities to schedule trains such that most trains (and their crews) return to their point of origination, rather than lay-over in Boston thereby:
 - Reducing the number of trains that lay-over in Boston,
 - Improving the opportunities for “reverse commuting”,
 - Allowing crews to begin and end their day at the same location thereby eliminating costly split shifts and / or costly deadhead crew moves.

Widett Circle can be the answer for all of MBTA's current and future lay-over needs.

Significant opportunities for the air rights development of Widett Circle

The air rights development opportunities at this key site are substantial.

38.3

It is critical that the layout of the site provides room for adequate support columns to enable air rights development – even if this means that one or two of the 28 tracks are sacrificed.

Widett Circle presents an unequalled opportunity for constructing a major stadium – capable of being the home site of the New England Revolution soccer team as well as being the crucial factor in Boston’s future desires to host the Olympics.

Substantial opportunities exist to provide direct access to the site from the Red Line, from Commuter Rail, and by foot from South Boston.

It is possible to create the ideal center-city sports facility.

It appears that the current ownership of the New England Revolution is favorable to this opportunity. However, only future negotiations (far beyond the scope of the South Station project) can confirm this interest.

If such an interest exists, conditions of the air-rights agreement must include a connection to a surface Red Line station and to a special use Commuter rail station similar to the Providence Airport “InterLink”. Ideally, this “InterLink” would extend above the MBTA property to provide pedestrian access from South Boston.

Track configuration issues at South Station

The real track configuration issues at South Station go beyond those identified by the DEIR.

The real capacity issue (“the scarce commodity”) is the “double slip switches”.

Double slip switches are the track structures that allow both a cross-over move and a turn. In other words, the single structure acts both as a cross-over and as a pair of switches.

The author conducted detailed analysis of all of the movements (scheduled and “pull-back” at South Station as part of the Central Artery / Tunnel (“Big Dig”) project. The inescapable conclusion was that station track assignments which minimized cross-over moves could resolve all track-occupancy conflicts during the “Big Dig” – to the extent that a two-track (rather than three-track) temporary bridge crossing over the Fort Point Channel was workable – thereby saving tens of millions of dollars in project costs.

38.4

The current DEIR should be revisited to possibly revise the proposed interlocking design.

Opportunity to improve distribution of South Station riders to their eventual destinations.

The author strongly endorses the concept of an additional head house providing direct access from Dorchester Avenue. 38.5

This design will substantially increase pedestrian access between South Station and nearby destinations in South Boston just across the Fort Point Channel.

More importantly, this design preserves the opportunity for a water taxi / MBTA water shuttle service to all of the center city waterfront and to the South Boston waterfront.

The harbor is an unused opportunity to move people around the most congested portions of the city.

Gerry Pieri

24 December 2014

781-834-4285

46 Bay Street, Box 394
Green Harbor, Massachusetts, 02041-0394

Johnson, Holly (EEA)

From: James RePass [jprepass@gmail.com]
Sent: Friday, December 19, 2014 2:23 PM
To: Johnson, Holly (EEA)
Cc: Michael Dukakis; Jay Ash
Subject: Comments re SSEP (South Station Expansion Project) EEA No. 15028

December 18, 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
 Fax: [617-626-1181](tel:617-626-1181)
 Email: Holly.S.Johnson@state.ma.us

Dear Secretary Bartlett:

I am writing to comment upon the DEIR recently released regarding the South Station Expansion Project – EEA No. 15028.

I appreciate the opportunity to comment, and the fact that a great deal of work has gone into this document.

It is therefore with regret that I must inform you that the DEIR as produced falls woefully short of addressing the expansion issues it was supposed to consider, or considering other viable possible solutions that are available to the Commonwealth.

Instead, and despite repeated input from former Governors, current political leaders, transportation advocates, and rail experts with national reputations that connecting North and South Station via a Rail Link would be the actual solution to capacity issues at both stations, this DEIR focuses on a narrowly conceived track-expansion project that comes nowhere close to being a comprehensive solution, and will in fact make things worse.

Building or expanding dead-end rail stations in major cities, when they can be connected, is foolish. No European country would dream of engaging in a project as ill-conceived as this one, in a city where the two major terminals are literally a mile apart, and where connecting them would provide not only the capacity both

North and South stations need, but create a new through-service up and down the Eastern Seaboard of New England for both intercity and commuter rail trains, effectively quadrupling the size of the employee/employer pool.

My organization is bi-partisan and has over 25 years of experience in matters such as this, and in getting projects built: we are the group that in 1991 successfully reversed a decade of Reagan-Bush administration opposition to the electrification of Amtrak's Northeast Corridor between New Haven and Boston, and thereby cut NYC-Boston travel times almost in half.

I wish to be as clear as possible that if this DEIR is not rejected, and then modified to include the Rail Link option, then we will oppose it in the courts, in the State House, and in Washington, where there is little appetite for transportation infrastructure projects, even good ones. This short-sighted SSEP project, as presently conceived will be dead on arrival.

James P. RePass Sr.

Boston MA

Founder and Chairman, the National Corridors Initiative

jprepass@gmail.com

617-269-5478

Johnson, Holly (EEA)

From: Joe Rogers [jrogers17@me.com]
Sent: Wednesday, December 24, 2014 5:25 PM
To: Johnson, Holly (EEA)
Subject: Comments RE: SSX_DEIR__EEA #15028

Joseph Rogers
 21 Wormwood Street, Unit 216
 Boston, Massachusetts 02210

December 24, 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 Bartlett,

I am writing to express my interest and support for the South Station Expansion project, especially as it relates to the opening of Dorchester Avenue, and the future build out of the Harborwalk and public areas of the current United States Postal Service General Mail Facility property.

However, as a civic/ community leader with the Fort Point Neighborhood Association, I am very concerned with the future of the development along the A Street Corridor, specifically parcels between Congress and West Second Streets. I understand part of the South Station Expansion plan includes a land exchange between the United States Postal Service and the Massachusetts Department of Transportation. It is imperative that the A Street parcels are developed within the stated objectives and guidelines of the City of Boston One Hundred Acre Plan. 40.1

I look forward to future community meetings to address the South Station Expansion project.

Respectfully submitted,

Joseph Rogers
 617-388-6813

Sending this to you via my email account shall constitute my signature.

Johnson, Holly (EEA)

From: Frederick Salvucci [salvucci@exchange.mit.edu]
Sent: Wednesday, December 24, 2014 4:40 PM
To: Johnson, Holly (EEA)
Subject: Fwd: Comment letter on draft EIR on South Station expansion Project. MEPA # 15028

Sent from my iPad

Begin forwarded message:

From: Frederick Salvucci <salvucci@exchange.mit.edu>
Date: December 24, 2014 at 4:39:07 PM EST
To: Frederick Salvucci <salvucci@exchange.mit.edu>
Subject: Comment letter on draft EIR on South Station expansion Project. MEPA # 15028

Dear Secretary Bartlett,

I am writing to support the expansion of South. station as an intermodal transportation center, but to also urge that greater specificity be required on a number of essential points, especially regarding :

- 1) the intended end state upon project completion
- 2) the compatibility of the intended end state with a number of other Massdoot priorities which are either not mentioned, or asserted to be compatible, but without adequate detail to demonstrate compatibility. These include the proposal for a new DMU service to better serve the Fairmont Branch; the proposal for DMU service from Back Bay to the convention center; The requirement in past EIR approvals for the expansion of the Bus Terminal, and inclusion of a Massport South Station to Logan direct shuttle, which will almost certainly be required to relieve the overloaded Silver Line as growth in the Seaport Innovation district in combination with growth in trips to Logan , are already exceeding the capacity of the Silver Line; the pedestrian access to the expanded Bus terminal, and the integration of the pedestrian flows of the rail and bus patrons through the common commercial service area, and connections to the Red and Silver Lines; the compatibility of this expansion of the south Station Terminal and the proposal for eventual through routing of service to North station and /or Logan airport.
- 3) the partial expansion possibilities in the event that the US post Office continues to not agree with the proposed relocation to a new facility nearby, in order to accommodate the South Station expansion, without losing the local jobs in the postal facility
- 4) the sequence of improvements that will allow the quality and capacity of service to South Station to grow in the near term when, even with the full cooperation of the Post office in relocating, passenger demand will continue to grow, while capacity may diminish because of construction disruption, particularly in the intensively used Back Bay to South Station track and signal area.

I have a particular concern that there needs to be much more transparency about the potential to increase capacity in the interlocking. Massdot has announced a policy of tripling the mode share of transit use state wide, which implies more than tripling of passenger rail capacity to the high growth Seaport Innovation district, which is already overloading. The my auto capacity and causing problems with regional access to Logan. ye the DEIR shows a 50 per cent increase in track layout in South Station, but only about 30 to 35 per cent increase in passengers by the 2035 period, nowhere near enough to keep pace with either environmental or economic necessities.

There must be a hidden constraint. is there an assumption of inadequate rolling stock capacity? IS there a signal and track capacity constraint between Back Bay and South Station that is projected to constrain capacity? Is the commitment to maintain the option for eventual service to North Station and / or Logan constraining capacity? Or might me those extensions actually be needed to achieve the tripling and more of capacity needed for economic and environmental policies to be satisfied? Would the use of greater numbers of DMU services to Fairmont, to Needham, To west station and Newton add or complicate capacity?

41.11

Moreover, what about layup capacity which is a problem today? The only efficient near term option is to use Widett circle, which is close, and in the less complex southern direction. Readville may be essential, but how long. Will it take to be ape rational? Beacon Park may also be eventually important, but today and for a substantial construction period in Allston the Beacon Park Yard is separated from South station by a one track two way severely constrained link, which is likely to lose capacity during reconstruction.

41.12

I strongly agree with the priority that Massdot is placing on South Station expansion, but the very high importance of the expansion of capacity makes it essential to have much better information available for public understanding and comment than is available in the DEIR. consequently I urge that a supplemental document be filed to answer these questions, and provide opportunity to the public for informed comment on the proposed actions.

sincerely,
Frederick P. Salvucci

Sent from my iPad

Drew Volpe

35 Channel Center St.
Unit 505
Boston, MA 02210
drew@dewdrops.net

December 24, 2014

MEPA Office

Attn: Holly Johnson, EEA #15028
100 Cambridge St, Suite 900
Boston, MA 02114
holly.s.johnson@state.ma.us

Dear Ms. Johnson

I'm writing to comment on the South Station expansion project. I've lived near the project site in Fort Point for more than a decade and I walk to it every day on my way to work.

I love cities and urban neighborhoods. I'm very glad to see that all modes of transportation, not simply cars, are being considered. **In particular, a cycle track and harbor walk would be an immediate and large benefit.**

The current plan is thin on details of the architecture and design of the expansion. Given how visible this stretch of city and skyline are, I hope this is given more thought. **South Station is one of the central gateways to Boston.** A large number of visitors go across the Summer st. bridge every day whether their in town for a convention at the BCEC, visiting sites like the Children's Museum, the Tea Party Ship, or the ICA, or just are arriving via Amtrak or the Silverline from Logan and want to take in some of Boston.

42.1

The current appearance of that area does not do our city justice. Boston is the birthplace of the American revolution, public schools, anesthesia, modern Venture Capital, and so much more. **A historic, innovative city like our deserves to make a better first impression on visitors.** I hope this project will grow to include the world class design and architecture it should have. **In particular, I think this site would be perfect for a significant work of public art.**

42.2

Sincerely yours,

Drew Volpe

