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15 State Street, Suite 1100  
Boston, MA 02109  
617 223 8104  
[bostonharbornow.org](http://bostonharbornow.org)

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Via email to: [Erin.Flaherty@state.ma.us](mailto:Erin.Flaherty@state.ma.us)

Secretary Matthew Beaton  
Executive Office of Energy and Environmental Affairs (EEA)  
MEPA Office, Attn: Erin Flaherty, MEPA Analyst EEA# 9131  
100 Cambridge Street, Ste 900  
Boston, MA 02114

Re: South Station Air Rights Notice of Project Change, EEA#9131

Dear Secretary Beaton,

On behalf of Boston Harbor Now, thank you for the opportunity to comment on the South Station Air Rights Notice of Project Change submitted by Epsilon Associates on July 29, 2016. Boston Harbor Now (as The Boston Harbor Association) commented extensively during the early stages of the project and the 2006 Final Environmental Impact Report.

In April 14, 2006, then-Secretary Pritchard determined that the Final Environmental Impact Report adequately complied with MEPA and allowed the project to move forward with permitting. As part of the current Notice of Project Change filing, the proponent is requesting that MEPA conclude the proposed changes are insignificant and the cumulative impacts of the project do not meet or exceed any review threshold. These changes in design, massing and square footage include:

- Total site acreage increased from 8.18 to 8.29
- A total gross square footage of 2,522,00 up from the previous 2,200,00 (this includes the parking garage expansion)
- Potential housing unit increase from 329 to 550
- Height reduction from 678 to 677.1 due to a change in FAA reference datum

- An additional 140 parking spaces bringing the current proposed total to 895
- Reduction in gallons per day of water use and
- Reduction in gallons per day wastewater generation

We understand this project received a legislative exemption from the Chapter 91 license requirement. As such, there will not be a Chapter 91 comment opportunity for a more detailed discussion of public benefits that typically accompanies a project of this size. However, this project is subject to broad scope MEPA review covering all potential environmental impacts. Due to the location of this project and because it involves air rights over MBTA property (state land), we feel strongly that it must fully mitigate potential impacts upon adjacent public resources.

We appreciate the inclusion of a number of detailed shadow impact studies in the Notice of Project Change. As long time advocates of the Harborwalk and public open spaces, we are most interested in renderings that reflect shadow impacts on adjacent open spaces. Although there will be a slight reduction in building height, as proposed, the project will create new shadow and wind impacts on existing public open spaces and pedestrian corridors such as the Rose Kennedy Greenway, Fort Point Channel, adjacent sidewalks, and portions of the Harborwalk.

We echo the Secretary's 2006 recommendation that the project proponent work with the City, Greenway Conservancy, Downtown BID and other local community organizations to design and implement a detailed shadow mitigation and public activation plan. Since the 2006 FEIR, the area around South Station has been transformed into vibrant and active gathering destinations for residents, employees, and visitors. For example, Dewey Square Plaza is a food truck mecca and popular lunch destination, hosting weekly summer block parties that draw thousands to enjoy music, food, lawn games, and outdoor seating.

Fort Point Channel is lined on both sides with destination restaurants, parks, museums and now General Electric's international headquarters. This project will make a significant difference in either furthering or impeding pedestrian and boater enjoyment of this increasingly vibrant area.

#### Multi-modal Transportation

In response to public comments received during the FEIR, the proponent has included a number of commitments aimed at reducing single occupant vehicle travel to the project site. These measures include car sharing spaces, preferred parking for vanpools, corporate T-Pass programs, and membership and extensive collaboration with A Better City's Transportation Management Association.

At the time the FEIR was granted, the proponent was encouraged by the Secretary and the public to reduce its parking supply. The current proposal calls for an additional 140 on-site spaces for a total of 895.

As Boston's busiest intermodal transportation hub and New England's most heavily used passenger rail facility, this project has a real opportunity to develop the city's strongest transit-oriented development. We ask that the proponent decrease, not increase, parking spaces in order to support the project's outstanding opportunity to maximize intermodality at South Station.

As planned, the South Station expansion project will provide a connection to the waterfront via the reopened Dorchester Avenue and extension of the Harborwalk. One of the stated goals of the expansion and the Fort Point Channel Watersheet Activation Plan, is to maximize intermodality by promoting pedestrian connections to the Fort Point Channel. To achieve that goal, this development together with the SSXP project should work to integrate strong water transportation and public access to the water both upstream and downstream of the Summer Street bridge. This is an important opportunity to connect this site to adjacent neighborhoods, open spaces, and Boston Harbor.

#### Sustainable Design & Climate Change Preparedness

The proponent is targeting LEED Gold for Phase 1 and LEED Silver for the remaining Phases 2 and 3. Since the 2006 FEIR for this project, there have been a number of advances to the LEED program, most notably, LEED Version 4, which includes climate resilience. We encourage Hines to attain these latest standards. We commend MassDOT for its cutting-edge research on the projected impact of sea level rise on the South Station Expansion Project and understand that its proposal to raise the sea wall along Fort Point Channel is consistent with the results of this research.

In the NPC, the project team remains committed to evaluating resiliency measures incorporated by others, including the SSXP. Given that 1) the intensity of future coastal storms is unknown but likely higher because of increased heat energy in ocean systems and 2) raising the seawall is a relatively inexpensive solution to preventing highly disruptive flooding of the Mass Pike Tunnel. We strongly encourage Hines to work together with MassDOT to do more to increase the coastal flood control measures at this site. Potential solutions could either involve higher and broader reconstruction of the seawall, or other redundant measures to protect the tunnel from flooding if storm surges are higher than anticipated.

We understand the South Station Expansion Project is working to add information about strategies to minimize South Station's vulnerability during flooding events. In addition to the LEED measures proposed, we encourage Hines to work closely with MassDOT as the project moves through the design process. We would be also glad to work with Hines to provide examples of beautiful flood resilient designs that have been successfully implemented in other cities around the world.

Sincerely,

Julie Wormser  
VP Policy

Jill Valdes Horwood  
Waterfront Policy Analyst