BOSTON HARBOR NOW
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Via email to: holly.s.johnson@state.ma.us
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Secretary Matthew Beaton
Executive Office of Energy and Environmental Affairs (EEA)
MEPA Office, Attn: Holly Johnson, MEPA Analyst EEA# 15028
100 Cambridge Street, Ste 900
Boston, MA 02114

Re: EEA# 15028 Final Environmental Impact Report (FEIR) for the South Station Expansion Project

Dear Secretary Beaton,

On behalf of Boston Harbor Now, thank you for the opportunity to comment on the Final Environmental Impact Report for the South Station Expansion Project submitted by MassDOT on June 30, 2016. Boston Harbor Now commented extensively on the 2013 Environmental Notification Form and the 2014 Draft Environmental Impact Report. We continue to advocate for the importance of developing a robust and comprehensive intermodal transportation network for the City of Boston.

South Station is Boston's busiest intermodal transportation hub and most heavily used passenger rail facility in New England. By 2035 the planned service increases to Amtrak and MBTA commuter rail will bring an estimated 20,000 additional passengers per day to South Station. Rapid growth of the South Boston Waterfront and increased regional travel have stretched South Station's ability to meet existing needs and absorb future demand. The expansion project addresses these capacity concerns and provides environmental and public benefits. Our comments focus on Chapter 91 public access benefits as well as coastal flood preparedness.

Chapter 91

We understand that South Station as a nonwater-dependent infrastructure facility is not subject to Sections 9.51-53 of Chapter 91 that promote conservation of water-dependent uses, the shoreline, and activation for public use; however, the expansion project is subject to 310 CMR 9.55, *Standards for Nonwater-dependent Infrastructure Facilities*. This section calls for projects to include mitigation and compensatory measures to ensure all feasible measures are taken to avoid or minimize detriments to the water-related interests of the public including *but not limited to* six areas (310 CMR 9.55(1), emphasis added). Specifically, the project is required to protect maritime recreation and associated public access and reduce flood and erosion-related hazards on lands subject to the 100-year storm or sea level rise. 310 CMR 9.55(1)(a), (e).

With increased heavy traffic congestion along Summer Street and Atlantic Boulevard, promoting alternative modes of transportation to and from South Station is essential. Water taxis and low- profile ferries to and from South Station via Fort Point Channel (at least to the Congress Street Bridge) provide excellent opportunities to connect passengers using the Red Line and associated commuter rail lines with other parts of Boston's waterfront.

Given MassDOT's renewed interest in examining new water transportation routes, we encourage MassDOT to reconsider its position that additional public benefits related to water transportation are not required. FEIR Page 3-53. Our reading of the relevant section of Chapter 91 suggests that protecting the water-related interests of the public includes ease of access to water taxis, water shuttles, and other forms of waterside transportation to and from South Station.

As planned, the expanded station will provide a connection to the waterfront via the reopened Dorchester Avenue and extension of the Harborwalk. FEIR Page 2-1. One of the stated goals of the expansion and the Fort Point Channel Watersheet Activation Plan, is to maximize intermodality by promoting connections to multiple transit services. To achieve that goal, plans for the expansion project that affect public access should include a water transportation component. This is an important opportunity to connect South Station to adjacent neighborhoods, open spaces, and Boston Harbor.

We support MassDOT's plan to phase construction and move forward with the demolition of the USPS facility, reopening Dorchester Avenue, and improvement to the Harborwalk before other project elements are completed. This ensures that improvements to public access are completed well before the entire expansion project, minimizing the disruption of public access and amenities in the Fort Point neighborhood.

Climate Change

We commend MassDOT for its cutting-edge research on the projected impact of sea level rise on its facilities. The proposal to raise the sea wall along Fort Point Channel is consistent with the results of this research.

The FEIR includes a proposal to raise a portion of Dorchester Avenue and the Fort Point Channel seawall by two feet to help prevent future coastal storms from flooding the Mass Turnpike and Ted Williams Tunnel. 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 recommend that MassDOT do more to increase its coastal flood control measures. This 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 MassDOT is working to add information about strategies to minimize South Station's vulnerability during flooding events. Section 3.10.2 has good initial considerations and we look forward to seeing these thoughtful resiliency measures included as part of the final building design. Coastal flood resilience is a major research topic for Boston Harbor Now. We would be glad to provide examples of beautiful flood resilient designs that have been successfully built in other cities around the world.

Sincerely,

Julie Wormser
VP of Policy

Jill Valdes Horwood
Waterfront Policy Analyst