



April 9, 2013

Secretary Richard K. Sullivan, Jr.  
Executive Office of Energy and Environmental Affairs (EEA)  
100 Cambridge Street, Suite 900  
Boston MA 02114

RE: [Comments on the ENF for the South Station Expansion Plan, Boston, MA EEA #15028](#)

Dear Secretary Sullivan:

WalkBoston has reviewed the ENF document for this project and offers our comments below.

South Station has been the subject of many studies and proposals, and this is by far the most extensive in terms of expanding the ground-level transportation uses of the terminal. The project will have many possible effects on pedestrian movements to and within the site and the specific walking connections that need the highest level of attention are:

- Shifts in pedestrian routes and volumes due to changes and additions to land use at South Station
- Connections between terminal facilities and external destinations
- Connections between indoor waiting areas and the rail platforms
- New access to a reopened Dorchester Avenue and the Fort Point Channel, including extension of the Harborwalk

#### Expansion of the terminal facilities

South Station once included the land covered by the Post Office that is now proposed to be recovered and changed back into a rail transportation facility. At the time that the terminal was in maximum use, the pedestrian ways leading into this portion of the track area were connected directly into the station headhouse ticket purchasing and waiting areas. Since the headhouse still exists, the functions of dealing with considerably higher numbers of pedestrians on the site should be relatively easy to accomplish, but pedestrian connections to the track area will need to be re-established.

Changes to the site over the past decades may constrain the ability of the station to handle the pedestrian traffic it once handled fairly robustly. These changes include:

- Construction of an office building at the corner of Summer Street and Dorchester Avenue which lies between the proposed new track area and Summer Street and thus obstructs a direct access path for pedestrians onto Summer Street and will require walkers to either exit the station via Dorchester Avenue or walk through the existing concourse area that is already serving other rail passengers.
- Proposed construction of an office tower directly above the site, with access to and through the South Station concourse. An office tower will add a substantial volume of pedestrian traffic in the concourse area, where current and future rail passengers wait for their trains.

- Possible future public/private development above the proposed tracks on the Post Office site will also result in additional pedestrian traffic that will either exit the facility on Dorchester Avenue or walk through the existing concourse area that is already serving rail passengers.
- Pedestrian connections between the existing bus terminal and the South Station concourse are at present somewhat indirect. Should pedestrian paths to and from the bus terminal become directly tied into the concourse area as a part of this project, another considerable volume of pedestrian traffic will be added to the concourse area.

#### Connections between terminal facilities and external destinations

- The existing connection between the South Station concourse level and the Red and Silver Line platforms requires a change of level, and focuses on a single set of escalators which are congested during current passenger peak hours. Additional access into the MBTA station may be required as development proceeds and as commuter rail and subway ridership increases.
- Surface pedestrian access between the Summer Street sidewalks and the concourse is not currently congested, but it is all funneled through the entrance foyer areas of the station – two parallel spaces that may not be adequate to handle increased pedestrian traffic in the future.
- Pedestrian access between the proposed enlarged terminal and both Dorchester Avenue and Atlantic Avenue should be reviewed in considerations of access to and from the station, and to alleviate pedestrian congestion at the Summer Street access and egress points.

#### Internal waiting areas and passages leading to rail platforms

The existing South Station concourse is likely to be significantly impacted by any of the proposed building options within the station property. People walking to and from the existing and new platforms will need to be accommodated, as will pedestrians to and from the possible air rights developments above the station and the tracks. At the moment, as we understand the proposal, all of these pedestrian movements are on one level, and we are concerned that there may be congestion in the limited floor space.

To accommodate the future pedestrian traffic, planners of the development should consider options such as the following:

- Wide passageway connections for pedestrians between the ends of the new track area and the existing concourse, the exits and the area leading to existing tracks.
- An expansion of the waiting area in the concourse (toward the tracks) to allow for the additional foot traffic. We are aware that such an expansion would involve changes in the existing window curtain wall between the concourse and the tracks, as well as cutting back on trackage, and is thus likely to raise significant issues.
- Mention has been made of a new floor level for pedestrian activities above the level that now serves pedestrians on the concourse. This idea should be pursued to see if improvements for pedestrians can be found.
- Provision of pedestrian passages beneath the present floor level of the concourse to and from the MBTA station to distribute intermodal pedestrian traffic more effectively.

#### Restoration of public access to Dorchester Avenue and the Fort Point Channel.

We are very pleased that Dorchester Avenue may be reopened and restored to public use.

The extension of the Harbor Walk made possible by this change will add important new connections to the walking network.

The need for data on pedestrian movements

- It is essential to have data on the existing pedestrian flows into and through the station as a basis for evaluation of proposals. We request that pedestrian counts and projections of walking traffic in all parts of the proposed terminal be included in upcoming work on the project.

We appreciate your consideration of our comments and your responses to them.

Please feel free to contact WalkBoston with questions you may have.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert Sloane". The signature is fluid and cursive, with a large initial "R" and a long, sweeping underline.

Robert Sloane  
Senior Project Manager