

**SOMERVILLE**  
TRANSPORTATION EQUITY  
**PARTNERSHIP**

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Secretary Ian Bowles  
Executive Office of Energy and Environmental Affairs  
MEPA Office  
Attn: Holly Johnson, MEPA Analyst  
100 Cambridge Street, Suite 900  
Boston, MA 02114

January 8, 2010

RE: EEA #13886

Dear Secretary Bowles:

The Somerville Transportation Equity Partnership supports Mass DOT's efforts to move the Green Line forward by approving the Draft Environmental Impact Review as a Final Environmental Impact Review with the requirement that critically important issues that have not been adequately addressed in the DEIR are resolved in the next phase of the project. To meet the SIP deadline for Green Line operation by December 31, 2014 Mass DOT must move forward with design now. In approving the FEIR we strongly request you to require either a supplemental EIR or addenda to the FEIR to ensure that the issues raised below are adequately addressed to maximize the ridership and benefits this very important project will provide for the next three generations.

We appreciate the opportunity to comment on MassDOT's work thus far and make our comments constructively to maximize the benefits of the Green Line extension that will provide access to better transit for over 80% of Somerville residents, reduce traffic mobile pollution in Somerville and, enable economic development.

#### **Public Participation**

STEP strongly recommends requiring a project-wide Citizens Advisory Group throughout project design and construction. Smaller station area local advisory groups should also be established to work with Mass DOT and the MBTA on detailed design, engineering, construction and start-up phases to address specific station design, land use, connectivity, and construction and mitigation issues. This was done successfully for the Red Line North extension. As part of the formal public process a procedure for determining remedies and/or compensation, incorporating community representation, should be required to handle instances when project mitigation proves insufficient to meet pre-agreed impact standards for noise, vibration, pollution and other environmental burdens.

MEPA should require collaborative planning, with community involvement and public coordination that intensifies immediately, before this project progresses and require that senior project staff work our of a centrally located field office to maximize access.

## **Maintenance Facility & Regional Environmental Justice**

The Yard 8 Option for the Maintenance Facility should be completely eliminated from consideration. There is unanimous opposition by the cities of Somerville and Cambridge and residents of both cities to use of Yard 8 for the Maintenance Facility. This location would increase Somerville's transportation infrastructure burden, negatively impact quality of life and obstruct needed economic development of Brick Bottom/Inner Belt. Avoidance of increasing such burdens in Somerville was clearly stated in the Secretary's Certificate to conduct the DEIR but ignored by Mass DOT in advancing this location as their preferred alternative without adequately considering other locations that lessen the impact of the facility and storage tracks on the city and residents.

We ask that you require Mass DOT to carry out **full analysis of the Option L alternatives and Option H for siting the Maintenance Facility**. Fully considering these sites can result in a solution that minimizes land-takings and the impact on residents and future economic development. As part of this analysis we ask consideration from Mass DOT to minimize the number of cars stored near the Maintenance Facility and consider covering some of the storage tracks with a green roof that will increase open space in the city and enable possible air rights development in the future. This would reduce the negative impact of the storage tracks. While initially adding cost to the storage tracks construction, covered trains are easier to maintain, reduces noise for abutters, improves the condition of vehicles and turns a burden into an amenity.

## **Station Design & Siting**

Designing and constructing the Mystic Valley Parkway / Route 16 terminus should be carried out at the same time as the rest of the project to serve the large number of riders from Medford, Somerville and East Arlington who would board the Green Line at the Route 16 station.

Design of the Green Line stations should seamlessly connect all clean modes of transportation, including current and re-routed buses. Station designs should accommodate bus drop off and pick-up (for example, using bus pull-out pockets or curb extensions) with maximum integration of transit modes and minimal street disruption. Mass DOT should work with the communities to align bus routes connect to Green Line stations at the start of Green Line service, as was done for the Red Line northwest extension.

Where possible station headhouses should be located on major streets and provide easy access for pedestrians and bicyclists. Design should enable access from both sides of the street and in all directions of travel. No parking should be provided at stations, but the design should permit car drop off. Working with the communities it is recommended to widen sidewalks leading to stations and provide safe cross walks where needed.

STEP agrees with the general location selected for the stations in the DEIR, but we believe that the preliminary station designs do not maximize ease of access particularly where riders will access stations at overpass bridges. Mass DOT should work with community representatives to reconsider station designs to maximize ease of access, efficiency and lower construction costs. We believe that pedestrian and bus access to stations and high station visibility from major streets should be prioritized.

Stations should provide adequate bicycle storage calculated based on a percentage of boardings at the stations. Bicycle storage should be sheltered from the elements, especially at Route 16, Lowell Street, and Union Square stations, to enable all-weather access.

We urge you to require that Mass DOT follow the Federal Transit Administration's proposed policy change to bicycle/pedestrian access to public transportation recognizing the importance of maximizing multi-modal access. [Federal Register: November 13, 2009 (Volume 74, Number 218), <http://edocket.access.gpo.gov/2009/E9-27240.htm>.} This will maximize access to the stations and increase ridership.

Stations should be constructed to meet ADA-compliant level boarding of low-floor Green Line cars that have sliding rather than accordion doors currently used on Green Line cars.

Station and station area designs must be developed through a formal and interactive community participation process to ensure that they fit into existing neighborhoods and support appropriate future mixed use development. Takings should be minimized to save the state money and to preserve land uses.

Now that construction of the relocated Lechmere Station is included in the project station design should utilize the East Cambridge Planning Team's pedestrian-friendly design ideas and re-use suggestions for the old Lechmere Station.

The terminus station at Route 16 should incorporate the Medford Green Line Neighborhood Alliance's ideas for minimizing takings.

For the overall project station design and siting should involve active participation of knowledgeable transportation accessibility advocates to ensure accessibility requirements are fully addressed.

### **Community Path Integration & Preservation of Corridor Transit Potential**

It is critical that the Community Path and its important station connections be designed and constructed simultaneously with the Green Line extension to facilitate direct pedestrian and bicycle access to the stations and to ensure a safe, attractive, and highly-functional Community Path. Delaying construction of the path reduces access to stations and increases the cost of construction once the extension is built. It should be noted that boarding estimates in the DEIR do not adequately reflect the extensive use in Somerville of the Community Path in increasing boardings at the Davis Square Red Line station.

It is critically important to require that track design and construction be done to enable adding future stations - between Lechmere and Washington Street / Union Square, between College Avenue and Route 16, and along a future Green Line extension to Porter Square that could serve both Cambridge and Somerville neighborhoods.

### **Economic Development & Regional Corridor Planning**

Track, station and Green Line corridor area designs must provide full roadway and community access to Brickbottom Inner Belt and Lechmere Station through reconstruction of Route 28 as a neighborhood and local business friendly surface boulevard serving pedestrians and bicyclists as well as cars. Improved connectivity between both sides of Route 28 is crucial for economic development, pedestrian station access, and improved quality of life.

Coordinate the Green Line extension with calming of the McGrath/O'Brien Highway in Cambridge and Somerville. In Somerville this would involve eliminating the Washington St. Overpass to turn the concrete elevated highway into an at grade boulevard that would connect Union Square to East Somerville and facilitate economic development for the area. The condition of the overpass requires reconstruction and funding has been identified in the Boston MPO RTP. The community does not want this overpass reconstructed. Design of an at grade boulevard should be carried out while the Green Line is being designed. In Cambridge traffic calming will be required along McGrath-O'Brien Highway to accommodate pedestrians going to the relocated Lechmere Station.

The design and siting of the maintenance facility should not prevent development of a street grid in Inner Belt/Brick Bottom that enables access from North Point, McGrath-O'Brian Highway and Washington St.

State and other leading Transit-Oriented Development guidelines should be utilized to promote strategic regional economic development within a mixed use context in the Brickbottom Inner Belt and Union Square Boynton Yard districts. Maintaining diversity in people and businesses while improving the natural environment is critical. Access to open space and greenery promotes health.

The Somerville Transportation Equity Project has been strongly committed to making the Green Line extension a reality. We are very pleased to see this project moving forward after years of delay. As the Green Line moves forward we are seeking that the best decisions are made through a collaborative process to maximize the environmental, transportation and economic benefits of the Green Line extensions.

Sincerely,

Ellin Reisner, President  
Somerville Transportation Equity Partnership