



CITY OF SOMERVILLE, MASSACHUSETTS
OFFICE OF STRATEGIC PLANNING & COMMUNITY DEVELOPMENT
JOSEPH A. CURTATONE
MAYOR

OFFICE OF THE EXECUTIVE DIRECTOR

January 8, 2010

Secretary Ian Bowles
Executive Office of Energy and Environmental Affairs
MEPA Office
Attn: Holly Johnson, MEPA Analyst
EEA #13886
100 Cambridge Street, Suite 900
Boston, MA 02114

Re: Comments on DEIR for Green Line Extension from:
Office of Strategic Planning & Community Development (OSPCD)
City of Somerville

Dear Secretary Bowles:

Along with Mayor Curtatone, I am writing to recommend prompt MEPA approval of MassDOT's Draft Environmental Impact Report (DEIR)/Environmental Assessment (EA) for the Green Line Extension as a Final Environmental Impact Review (FEIR) document; conditioned upon a written commitment from MassDOT to (1) eliminate the Yard 8 maintenance facility from consideration; (2) complete the design and engineering to the Route 16 terminus so that if resources are made available, the Route 16 terminus can be constructed at the same time as the rest of extension; and (3) complete the 100% design of the Community Path from Lowell Street to Northpoint, while assisting the City to secure funding for construction.

In addition, I strongly urge that the MEPA certificate direct MassDOT to improve station design and location – with an emphasis on multimodal connectivity – during the preliminary engineering process and commit to a robust public process going forward.

As Mayor Curtatone has repeatedly stressed, the Green Line must be designed to solve existing problems and anticipate future needs. Although an expanded light rail system is certain to improve air quality by reducing the region's long term over-reliance on cars, the environmental benefits of the



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project will be vastly increased through sensitivity to connections to the neighborhoods and ongoing public involvement to refine the design as it moves forward.

This letter will provide a detailed breakdown of our specific comments. The comments are structured to highlight the mandate from the EENF Certificate, summarize how the issue is treated within the DEIR, and provide the City of Somerville's response to the topic.

I. Maintenance Facility

- ❖ *EENF Certificate Requirement:* Requires the study of a combined Boston Engine Terminal (BET)/Green Line Maintenance Facility and the evaluation of Yard 8 in an effort to avoid, mitigate, and minimize negative impacts (EENF page 9, paragraph 2).
- ❖ *DEIR Submission:* An unchanged Yard 8 remains MassDOT's preferred alternative, however, the DEIR indicates that additional study will be conducted on two locations, Option L and Mirror Scheme H, which abut the Boston Engine Terminal (DEIR, Vol. 1, page ES-22, paragraphs 3 & 4).
- ❖ *City Response:* Yard 8 does not meet any of three basic criteria (quality of life, transportation access, economic development) developed by the City and would clearly block essential future connections between Inner Belt, Brickbottom, and Route 28. The location simply does not allow for the avoidance, mitigation, or minimization of negative impacts as is required in any environmental review certificate. Moreover, unified opposition to the location in the form of expected litigation would delay the project and jeopardize New Starts funding.

Therefore, Yard 8 must be eliminated from consideration and replaced by Mirror Scheme H or Option L. Although Mirror Scheme H meets all of the City's criteria as proposed and remains the City's preferred alternative, Option L will also prove acceptable to the City, provided some additional design changes are incorporated to meet MEPA's requirement of avoiding, mitigating, and minimizing negative impacts. In particular, further consideration is needed regarding whether aspects of the Green Line maintenance facility can be combined with the BET.

Following is a summary of our analysis of the three proposed maintenance facility locations. For more details on the comparison of engineering merits, operational efficiencies and proposed relative timelines, see the attached letters from the City.

Yard 8 - Fails to meet all three of the City's criteria:

- No Negative Impact on Quality of Life – Yard 8 would directly abut Brickbottom Artist Collaborative - the only residents in the area - and have negative sound and vibration impacts. Moreover, several stories of the artists housing would be blocked from light by the facility.

- No Negative Impact on Economic Development Potential – Yard 8 would eliminate a permitted project at 150 Inner Belt Road (190,000 square feet commercial building). Noise and vibration could additionally disrupt sensitive commercial operations at 200 Inner Belt. The mere threat of MassDOT's current proposal has endangered the current art restoration and storage use that has recently revitalized 200 Inner Belt Road. Yard 8 would occupy premier development parcels on the key border between Inner Belt, Brickbottom, and Route 28 corridor. In addition, City study suggests that air rights development at Yard 8 would be extremely difficult and cost prohibitive.
- Minimal Impact on Future Access to District – Yard 8 would permanently sever Brickbottom from Inner Belt and prevent a new street grid from being established, as the facility would be built up three to six feet higher than street level, on retained fill. This option would then require 300+ feet of tunnels to penetrate and provide connection between Inner Belt and Brickbottom, an inordinately expensive and ineffective option.

Mirror H - Meets all three of the City's criteria:

- No Negative Impact on Quality of Life – Mirror Scheme H moves the facility away from the district's only residents. Even assuming the future development of Northpoint, Scheme H would border (or be potentially submerged under) parking garages and not directly affect residents. Moreover, the facility could be designed to mute the impacts of the existing Boston Engine Terminal.
- No Negative Impact on Economic Development Potential – Mirror Scheme H requires less acreage in takings than MassDOT's other proposals and would allow for the construction of a new 190,000 sq. ft. building at 150 Inner Belt Road (projected to occur within two years).

Again, even assuming the eventual build-out of Northpoint, Mirror Scheme H could provide a potential foundation for Northpoint's parking garages. Additionally, given that the Northpoint parcels in Somerville have neither been zoned nor permitted, the City would be willing to consider height and density bonuses in return for the incorporation of the facility. Such an approach conforms to the Commonwealth's stated goal of implementing smart land use planning and transit oriented development.

- Minimal Impact on Future Access to District – Mirror Scheme H takes advantage of existing transportation infrastructure and is located in such a way as to not further isolate the Inner Belt district. Moreover, Mirror H allows for easy connectivity between Inner Belt and Northpoint – thereby benefitting both districts.

Option L – Has strong potential, with limited modifications, to meet City's three criteria:

As currently proposed, Option L moves the facility further away from the Brickbottom Artists



Collaborative and onto lower valued parcels abutting the BET. Moreover, Option L's location does not preclude critical multimodal connections to be established between the Inner Belt, Northpoint, Brickbottom and Route 28 and it allows for a better alignment of the Community Path. In addition, according to MassDOT, the operational benefits of Option L exceed those of its alternatives, and would allow for more efficient Green Line service. We recommend that the design for Option L be revised to:

- **Plan for future air rights developments:** Based upon its location, Option L has the potential to allow for air rights development and, indeed, would provide an ideal location for a future parking garage built above the facility. It will be important for the ongoing design efforts to plan for air rights development so that it can be easily facilitated in the future.
- **Share parking with BET** – Somerville has limited land for economic development. Throughout the City, the Board of Aldermen is rezoning properties to require structured parking instead of surface lots which are inefficient uses of land. To this end, the 100 surface parking spots for the exclusive use of the Green Line Maintenance Facility should be eliminated and any short-term surface parking should be shared with the adjacent BET. If the existing BET parking lot was re-striped for maximum efficiency and shift changes between the BET and Green Line facility were coordinated, we are confident that sufficient space would exist to meet the needs of both facilities.
- **Move storage tracks away from developable areas and toward BET:** At present, there are two areas proposed for storage tracks, one of which is relatively close to the Brickbottom Artists Collaborative and is very close to prime future economic development areas. The storage tracks should be concentrated in areas closest to the BET and the amount of storage reduced to the number of trains needed to serve the Extension only.
- **Ensure storage tracks do not impact automobile/community path/Urban Ring Bridge:** Any storage must be designed so that it does not adversely impact the planned bridge which will provide a critical link between Inner Belt and Northpoint. Specifically, the width of the tracks should be minimized to limit the size of the span and make sure that the ramps leading up to the bridge do not create an additional barrier within the Inner Belt.
- **Minimize noise & vibration:** The City requests that noise and vibration effects be carefully mitigated in order to lessen the facility's impact on surrounding parcels. At present, there is limited development in the vicinity of Option L, but in the future, this will become a mixed use environment with between 7 and 10 million square feet of additional development.

The City understands that MassDOT has estimated the cost for Option L to be higher than other options, however, it is critical to recognize that the opportunity costs for Yard 8 in terms of lost economic development and future revenues to the Commonwealth and City of Somerville are far in excess of Option L. The 7 to 10 million square feet of new development anticipated in the

Inner Belt/Brickbottom simply will not occur if Yard 8 is selected. This will result in worsened environmental conditions as this development will be required to move further away from the central core of the Boston Metro Area where transit is less accessible or outside of Massachusetts at a loss to all taxpayers.

Comments for All Maintenance Facility Alternatives

With the introduction of any maintenance facility in the area, it is critical that several elements be taken into account including:

- **Properly size the facility to serve Extension only:** While Somerville has gone on record with its willingness to accept another regional maintenance facility, the City and its residents should not be forced to accept the burden of storing trains cars in excess of the 38 vehicles ([Appendix C: Green Line Support Facility Alternatives Analysis](#), page 1, paragraph 5) needed to serve the Extension. East Somerville is an environmental justice community that has already absorbed the negative impacts of the 23 acre BET. Adding storage beyond what is specifically required to facilitate the Green Line Extension will further adversely impact this community. Rail storage creates additional barriers to both future development and access points. In addition, it reduces the City's taxable land in an area slated for intense future development. Storage for the 80 cars proposed in the DEIR is far in excess of what is required to complete the project and each acre of land will diminish Somerville's ability to secure economic development and the associated tax base and jobs for the community. There is no justification for requiring Somerville to address longstanding storage needs of the entire Green Line system. Those needs should be addressed elsewhere.
- **Centralize MBTA facilities at new maintenance building:** Presently, the MBTA has considerable commuter rail uses scattered throughout the Inner Belt including office space and a significant amount of outdoor storage. Great potential exists to consolidate these new uses at the Maintenance Facility site, particularly at a combined BET/Option L site. If possible, the plans for the Green Line Maintenance Facility should include adequate office space to incorporate the MBTA commuter rail command center and the grounds of BET facility should be redesigned to move all the outdoor storage in the area so that it is next to BET. Finally, we request that any vacated MBTA parcels be provided to the City for future development.
- **Improve access into Inner Belt and Brickbottom Districts:** The addition of another layer of transportation infrastructure presents an opportunity for the Commonwealth to ease historic burdens that it has placed upon the Inner Belt and Brickbottom Districts. Currently, the only access to the Option L maintenance facility is provided for by "tubes" underneath the raised Lowell commuter rail line. These makeshift access points often cause back-ups or even stuck vehicles and are clearly inadequate for more intense use of the district. Opportunities include, but are not limited to: expanding and multiplying the access points beneath the Lowell Line,

moving the Lowell Line, or building bridges or tunnels out to Route 28 and Brickbottom.

- **Ensure storage tracks are covered:** In order to minimize the adverse impacts of the storage, including noise, vibration and visual appearance, it is important that the storage tracks be covered and screened properly. The appearance of the maintenance facility will directly impact the area's attractiveness to future business investment. In addition, by covering the tracks, the Green Line cars will be secured from vandalism and graffiti, thereby reducing future operating costs.

II. Station and Rail Location and Design

- ❖ *EENF Certificate Requirement:* Requires that the Extension maximize the public benefit and preserve the integrity and character of neighborhoods (EENF, page 2, paragraph 1). Moreover, the Extension should spur development and take into account local and regional growth plans. Similarly, communities should pass zoning to complement the Project (EENF, page 5, paragraph 5 & 6). The Certificate also acknowledges that the key themes running through extensive public comments included calls for enhanced land use planning, further analysis of station locations, clear identification of land takings, and mitigation of environmental impacts (EENF, page 2, paragraph 2). Finally, the Certificate calls for alternatives regarding service to Brickbottom/Twin City, Winthrop Street, and Route 16 (EENF, page 10, paragraph 2).
- ❖ *DEIR Submission:* MassDOT's submission provides analysis of each stations' affected environment (DEIR, Volume 1, Chapter 4), as well as 10%-level layout, plan, circulation, and elevation (DEIR, Volume 2 – Figures). The DEIR does not provide a full alternatives analysis of the Twin City or Winthrop Street stations.
- ❖ *City response:* It is difficult for the City to offer specific comments due to the preliminary nature of the station designs but it is clear that during the upcoming engineering stage modifications will be needed to respond to the key themes identified below. Therefore, the MEPA certificate should call for four overarching approaches to station design and siting, specific examples of which are provided below:
 - **Station designs need to reflect local integrity and character** – Somerville is a community made up of diverse and disparate neighborhoods, each of which has a distinct and vibrant character. However, MassDOT's 10% drawings represent an attempt to replicate near identical designs throughout the Extension while adapting for site specific access issues. The City does not wish to request designs that include expensive materials or delicate details, but ones that simply acknowledge the surrounding environment. Different neighborhoods will require different treatments. The Gilman Square station, for example, will be located on the triangle of land that currently hosts City Hall, the High School and the Library, and is defined by historic brick and stone structures. Union Square, alternatively, is a bustling and quirky central business district at the heart of the City's arts community zoned for intense development.



The Lowell Street station will be located amidst a dense residential district, whereas the Ball Square station will support a commercial strip of small storefront businesses. The Washington Street station has the ability to redefine an existing railroad legacy and create a link with the abutting neighborhood. The City wishes to work with MassDOT to develop architectural designs that meet the MBTA's operational needs while also creating important neighborhood landmarks.

- **Station locations should maximize public benefit and support thoughtful transportation oriented development** – Stations need to have clear frontage and provide easy access from the surrounding neighborhoods. Furthermore, the location of stations and proposed construction staging areas should be strategically sited to eliminate unwanted uses and provide parcels for future smart-growth development. Significant opportunity for transit oriented development on or adjacent to stations exists at Gilman Square, Ball Square, and the Rt. 16 terminus. (A 199 unit TOD development has already been permitted at the Lowell Street Station.) Somerville pledges to be a partner in identifying those parcels where opportunity exists and to donate municipal land whenever possible. In exchange, the City would seek to receive the residual land left over after station construction or at least the opportunity to work with MassDOT on developing plans for the sites.
- **Station locations and design should anticipate future system expansion** - Full design and engineering should not only be completed to Route 16 but, as required by the EENF certificate, the feasibility of a second-phase Brickbottom/Twin City location should be determined so that the final design and construction of the Extension does not preclude an additional station in the future. Further, the Union Square station location should not prevent a future connection to Porter Square. At present, it appears that the alignment of the station would prevent it from continuing past Prospect Street. Lastly, the Route 16 terminus should be designed to facilitate potential extension to West Medford in the future and should show clear connections to the Minuteman and Alewife Brook paths.
- **Station design needs to acknowledge other transportation projects** - Although we recognize that planning and engineering has to acknowledge current constraints, accommodation needs to be made for changes to the existing landscape. The City is currently working with the Commonwealth to lower McGrath Highway and create a boulevard. If possible, the Green Line Extension should accommodate this beneficial change. Similarly, the rail lines through the Brickbottom district will need to be elevated or depressed in order to allow future connections between Inner Belt, Brickbottom and Cambridge. The City is in the process of analyzing the necessary elevation and hopes to work with MassDOT as the engineering is further refined.

In addition to the three overarching principles, the City has significant specific comments related to one station:



- **Brickbottom / Washington Street Station location and design should be refined** – The planned Brickbottom Station is the lynchpin for future development in the Inner Belt and Brickbottom Districts anticipated at between 7 and 10 million square feet of new development. Unfortunately, the design included in the DEIR is inadequate to address existing and future ridership needs in this area. First, given that the Secretary's certificate requires the Extension to spur development and take into account local and regional growth plans, the Brickbottom/Washington Street station should be moved to Washington Street. This will allow improved multi-modal access when compared to a station that is 240 feet away from this major arterial on a side street. In addition, it is essential that access be provided to the residential neighborhood to the north, the Inner Belt to the east and Brickbottom to the south and west. Consideration should also be made whether the platform length should be increased to facilitate the movement of the large numbers of riders who will access this station.

III. Multi-Modal Connectivity

- ❖ *EENF Certificate Requirement:* Stresses the need for MassDOT to provide clear access for bikes, pedestrians, and buses (EENF, page 10, paragraph 1). Existing bus routes should be examined and changes delineated (EENF, page 11, paragraph 3). Future projects, including the reconstruction of Route 28, Northpoint, a relocated Lechmere, the Community Path, and the Minuteman Path should all be taken into account during Green Line Planning (EENF, page 6, paragraph 4). Designing and building the Community Path along with the Green Line is critical (EENF, page 6, paragraph 5).
- ❖ *DEIR Submission:* Due to the only 10% drawings and unclear station elevations, multimodal access points for each station remain inconsistent or unclear (DEIR, Vol. 2 – Figures). Furthermore, MassDOT argues that no change in bus routes would be necessitated by the Extension (DEIR, Vol. 1, page 5-37, paragraph 3) and that the Community Path completion would not impact the number of bike-based commuters (DEIR, Vol. 1, page 5-37, paragraph 1). Finally, the DEIR commits only to “progressing the design of the Community Path” and explicitly states that construction of the Path is not intended to be part of the Green Line project (DEIR, Vol. 1, page 3-58, paragraph 2).
- ❖ *City Response:* An early priority for the preliminary engineering process should be to establish strong bus, bike and pedestrian (including ADA) connections, particularly by clearly incorporating the Community Path, strong connections between the path and the stations, and providing sufficient bike parking.
- **Bus connections should be improved** – Accommodating safe and easy transfer to the bus system is one means to ensure high levels of ridership for the Extension. Therefore, the location of bus stops should be the subject of considerable focus and attention. In terms of the bus routes themselves, MassDOT's definitive statement that a new light rail system

with seven stops will not impact existing bus service simply defies logic. Further studies should be undertaken and if data show a need, MassDOT should be prepared to coordinate bus reroutings, additions or eliminations in advance of the Extension completion. The City is very willing to work with MassDOT on the re-routing and is currently collaborating with MassDOT and MIT to analyze the bus routes. In addition, all kiss n'ride design elements planned in Somerville, with the exception of Rt. 16, need to be eliminated as the City has no desire to encourage auto drop off at the stations. Instead, the kiss n'rides could be converted to bus pull-ins to create the strongest and safest possible link.

- **Explicit commitment to fully design and construct the Community Path along the Extension (NorthPoint to Lowell Street) is needed** – Despite Secretary Aloisi's written commitment to complete design of the Path (Letter to Mayor Curtatone, Feb 11, 2009), the DEIR does not echo this obligation. Additionally, although the MEPA certificate need not require construction of the Community Path along with the Green Line extension, MassDOT should retract their statement that the Path is not intended to be part of the project. For cost-effectiveness, the Path should be constructed in conjunction with the Extension, with funding as part of the project or a combination of outside sources. Construction of the Path with the Extension is the most realistic and effective way for the Path to be completed. Additionally, an analysis should be done to see if construction of the path would improve the Green Line Extension's New Starts application and, if the Path's positive impact on ridership would strengthen the application, construction of the path should be included in the project. Past precedents of the Orange Line Southwest Corridor project and the Linear Path over the Red Line prove path construction to be a feasible and effective way of increasing multi-modal connections to the stations. Additionally, attention will need to be paid to the design of the path to ensure that it is very visible and intuitive for riders. At the 10% design stage, it is unclear how the path moves across the Green Line tracks from the Inner Belt to Brickbottom or how riders in the vicinity of the High School/Medford and School Streets will have access to the Gilman Square Station.
- **Increased bicycle parking is necessary** - The amount of bicycle parking presently described in the plans (270 spaces) will be completely insufficient for the expected number of bicyclists coming to the stations. The current 270 spaces will only serve approximately 1% of the expected ridership. Based on the present parking at Red Line stations, bike parking at 3-5% of ridership levels may be needed. A quick visit to the Davis Square Station where bicycles are locked to every possible pole, rack or tree provides a vivid picture of the demand for bicycle parking in Somerville, a community with a median age of 31.1 years. The stations should be redesigned to incorporate bike parking equivalent to approximately 5% of ridership at the Union Square, Route 16 and Lowell Street stations and 3% at the others. Bicycle parking locations should be as close to as possible to the entrances and in well lit and safe locations. Bicycle parking should be

covered if at all possible and racks should incorporate city standards.

III. Public Process

- ❖ *EENF Certificate Requirement:* Calls for strong proactive coordination between MassDOT, MBTA, citizens, cities and other stakeholders throughout planning, design, and construction, (EENF, page 1, paragraph 2) using Urban Ring planning process as a model (EENF, page 6, paragraph 2). Impacted areas targeted for noise, vibration, and construction mitigation should be identified and specific measures described. Commitments should be clear and responsible parties defined (EENF, page 13, paragraph 1 and page 14, paragraph 3).
- ❖ *DEIR Submission:* Although MassDOT documents an extensive public participation process to-date, as well as close coordination with staff and elected officials from impacted cities, no response is given to the Certificate's call for future proactive coordination. Potential noise and vibration impacts were projected for numerous sites along the Extension (DEIR, Vol. 1, Chapter 5). According to MassDOT, planned mitigation measures would prevent moderate and severe noise impacts and keep vibration effects below residential impact levels. Construction mitigation measures are also described in detail (DEIR, Vol. 1, Chapter 5 and 6).
- ❖ *City Response:* Community involvement and proactive public coordination should intensify as the Extension progresses and continue beyond the completion of the project.
 - **Advisory Group structure should be developed and regular meetings scheduled** - A new project-wide Advisory Group should be convened and, if needed, an additional group developed to focus on maintenance facility planning and design. A regular meeting schedule should be established for an on-going two-way dialogue as issues and opportunities present themselves during the project's development, rather than calling ad-hoc meetings to present updated plans. Station area community meetings should be held before any further design and engineering take place.
 - **A transparent and predictable system of adjudicating noise, vibration, and construction impacts should be defined** - A supplemental EIR document should include clearly delineated procedures for determining further mitigation or compensation if stated noise and vibration targets are not reached. Such a system should protect abutters from having to resort to legal options in the event of continued noise and vibration impacts.

Once again, I thank you for this opportunity to provide the City's perspective on the Green Line Extension DEIR submission. We believe that a Certificate should be issued accepting the DEIR as the FEIR thus allowing the long delayed Extension to enter preliminary engineering, provided that MassDOT commits in writing to the elimination of Yard 8, and the complete design of the Green Line to Route 16 and the Community Path from Lowell Street to NorthPoint in Cambridge. Our other requests can be incorporated into a short supplemental document or the engineering process



itself.

Attached please find prior correspondence related to the Green Line Extension for inclusion in the DEIR review.

Please do not hesitate to contact me at 617.625.6600 x.2510 or mlambo@somervillema.gov if you have any questions.

Sincerely,

Monica R. Lamboy
Executive Director

Attachments:

Letter to Steve Woelfel, September 12, 2008

Letter to Steve Woelfel, December 30, 2008

Letter to Steve Woelfel, January 26, 2009

