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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: EEA #13886

Dear Secretary Bowles,

I appreciate the opportunity to comment on the Green Line Extension (GLX) FEIR. First, as a strong advocate for the project I want to note that I am appreciative that MassDOT has heard the concerns of the community and agreed to relocate the Maintenance Facility to Option L and has worked to respond to requirements set forth in the certificate that was previously issued. I look forward to continue working with Mass DOT, the MBTA, and fellow members of the Design Working group to ensure that the best decisions are made to move the project forward successfully and on time. There are still a number of important issues that need to be addressed to fully comply with the Certificate and move the project forward successfully, but none that should result in delaying the project any further. My comments will address the following:

- Ensuring maximum accessibility to stations
- Integrating design and construction of the Community Path with the GLX
- Refinement of Option L Maintenance facility Design (incorporating Option L alternative configuration)
- Compliance with public participation requirements set forth in the Certificate and in 301 CMR 11.01 (1) (a).
 - Mitigation for businesses and residents during construction and when service is operating
 - Public Involvement from Design through construction
- Designing GLX to enable future expansion to Porter Square, as well as adding an interim station between Lechmere and Washington St. /Brickbottom and Union Square.

The Green Line Extension is a legal commitment made by the state with the Conservation law Foundation in 1990. There have been many delays in the process and it is now 20 years since that commitment. We have learned that Mass DOT has stated there will be additional delays in their SIP Report to Mass DEP. Lack of compliance with the SIP commitments will require mitigation. This presents an opportunity to require completion of the Community Path, assignment of the new low emission diesel locomotives to the Fitchburg and Lowell Commuter Lines, and pressing forward with the design and reconstruction of McGrath Highway to eliminate the overpass at Union Square.

There are a number of that remain major issues for the GLX that must be addressed. Ensuring that the Medford Hillside Neighborhood is served and the GLX terminates at Route 16 is critically important, but resolving these issues should not delay Mass DOT from moving forward with the project Design phase.

I hope you will carefully consider my comments on the FEIR below. I have also attached the final report from the Community Corridor Planning Project Community Design Workshop that we are submitting to MassDOT for use in station planning. The Community Corridor Project appreciates that the Secretary has supported its role in the planning of the GLX.

Station Accessibility:

- Require design and siting of the stations to provide the most convenient connections to bus routes that will bring people to the Green Line (particularly at Union Square, Lechmere Station, Washington/Brickbottom, Gilman, Ball Square and Route 16).
- Require that station siting and design make pedestrian, bicycle and bus access easy, safe, and convenient.
- Design and reconstruct the bridges requiring incorporate the best access to the proposed stations and enable construction of the Community Path.
- Support the East Cambridge Planning Team's (ECPT) community and development friendly plans for redesigning Lechmere Square
- Support the East Cambridge Planning Teams efforts to improve pedestrian crossing at McGrath Highway and do not permit the addition of a turning lane at Lechmere that will only encourage increased traffic at the expense of pedestrian safety.
- Design the track configuration and Union Square Station to make possible a future extension to Porter Square.
- Although not covered in the FEIR, a Route 16 station would be the best terminus for Green Line because it would serve the environmental justice neighborhoods of Somerville, Medford, and East Arlington residents as well.

Extending the Community Path

- Require that Mass DOT complete design the Community Path to include the area from Inner Belt to North Point. (Currently the State committed to design the Path only to Inner Belt.
- Budget the construction of the Path extension with the Green Line Project. The Path should be built with the Green Line Extension for the following reasons:
 - The Path will be critical for pedestrian and bike access to the new stations.
 - The Path provides active transportation access now to the Davis Sq station; its extension will increase this for many more Somervillians and will be the prototype for the state's Green DOT transportation vision.
 - The path will knit neighborhoods together that have been divided by the commuter rail tracks and the McGrath Highway for decades.
 - The Path will increase ridership at the lowest cost to the MBTA (as the Path has done for the Davis Sq. T stop).
 - The Path extension is only 2.5 miles; however, its construction will link the 18-mile Minute Man Path to Boston and to the Charles River Bike Path. Completion of the Path will provide a critical missing link in the regional bike network.
 - The 2.5 mile Path that will serve the Somerville Environmental Justice neighborhoods of Winter Hill and East Somerville is the only part of the Path not built or funded for completion while the completed and funded parts of the Minuteman Trail and Path from North Point across the Boston Bridges serve communities not designated as environmental justice areas.

Public Participation for the Design and Construction Phases of the GLX

I strongly agree with the Secretary that we need to learn from the lessons of the flawed DEIR public process that wasted time and resources on analyzes that were not in the scope of the project (tunneling, for example), did not enable timely interaction between Mass DOT (its consultants) and MBTA staff to address many concerns raised in the process. Infrequent and delayed meetings with agendas that did not allow for discussion of critical issues and the lack of

clearly delineated methods to address concerns between meetings resulted in an inadequate process.

In some ways the plan for public involvement in the FEIR now meets some of the public participation requirements of the Certificate, but does not meet some of critically important requirements for the public process, cited by the Secretary. Specifically, the Secretary's Certificate states that the FEIR present a Public Involvement Plan "to facilitate robust community participation beyond the conclusion of the MEPA process" that includes for example, representatives of regional planning agencies, local government, business interests, community groups, representatives of EJ areas and the disabled community, abutters, and bicyclist and pedestrian groups) **"to provide meaningful community involvement throughout the duration of the entire project, including detailed design, engineering, construction phases"** (my emphasis). (DEIR Certificate, p 25).

To address this going forward I strongly request that:

- Mass DOT comply with your requirement and add representatives from regional planning agencies (MAPC) and the Conservation Law Foundation
- Appoint a community representative for the Maintenance Facility (no one was selected despite applications by several technically knowledgeable project proponents to participate).
- Appoint representatives of the business community and the environmental justice community

Require that Mass DOT work with the DWG to:

- Specify the level of decision-making DWG members will have in setting agendas, approving designs, meeting with consultants when requested, etc. On page 3 of the DEIR Certificate it states that "... for the project to reach its maximum potential, MassDOT must continue to, and in some ways enhance or expand, project design and coordination efforts in a collaborative manner with State and city agencies, citizens, local businesses, and other stakeholders **during all aspects of the project-planning, design and construction** (my emphasis). Meeting this requirement should improve the public participation process. Further, agenda setting for meetings should be shared by Mass DOT and the DWG members.

As part of the public involvement plan require Mass DOT and its consultants to work with community members who have been able to make cost effective and beneficial design recommendations for the GLX and Maintenance facility either through the DWG or as part of the broader public involvement effort.

Require that MassDOT meet the following requirement:

- The Certificate (p. 25) states a key to the overall success of the Green Line Extension project is the effective integration of light rail service into the existing urban landscape. It goes on to state that the PIP should facilitate collaborative land use planning, review of advanced project design elements (notably station design), and implementation of mitigation measures. I
- The DWG should include MBTA design and engineering staff at meetings to ensure that speedy discussion of issues and answering of questions occurs. This will help to keep the project moving forward. I note the Secretary's comments on page 31 that explicitly address this: *" as project design advances, the Massachusetts Bay Transportation Authority (MBTA) will become the lead agency on the project and will ultimately be responsible for the construction and operation of the service. MassDOT and the MBTA must forge a collaborative relationship and make a strong commitment to continuing civic engagement opportunities during the design process as well as a transparent public information and outreach process once construction commences."*

The Maintenance Facility

- Somerville appreciates Mass DOT's selection of Option L as the site for the Maintenance Facility. This siting is better for Brickbottom and East Cambridge residents, and makes economic development in Brickbottom/Inner Belt area possible.
- I strongly urge you to require thorough Investigation of the Option L Alternative to move the Facility closer to I-93 (further to the east) to reduce the Green Line Extension costs of land-taking.
- Swap the land where the Commuter Rail office is located near Washington St. for the land the State will take for Option L to reduce the cost of the project and provide the city with good developable land in Inner Belt.
- Eliminate McGrath Highway overpass and open up Inner Belt & Brickbottom to reconnect the neighborhood
- Require Mass DOT to show where tracks will be located around Brickbottom. The diagrams in the FEIR show the same track configuration around Brickbottom as required for the Yard 8 Maintenance Facility which appears to require land-taking.

Construction Phase

I thank Mass DOT for agreeing to establish a project field office and ombudsman and agreeing to a robust plan to work with neighborhood residents and businesses during construction. In order to ensure that this takes place I request that you require MassDOT to transform the DWG to the Construction Working Group to ensure that the project works closely with the affected neighborhoods and business districts to minimize the construction impacts on quality of life and business during construction.

Very Sincerely,

A handwritten signature in cursive script that reads "Ellin Reisner".

Ellin Reisner., President
Somerville Transportation Equity Partnership