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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**

The Somerville Chamber of Commerce values the opportunity to comment on the Final Environmental Impact Report (FEIR) for the Green Line Extension (GLX) project. We also appreciate your efforts and those of the Massachusetts Department of Transportation (MassDOT) to move this project forward consistent with the Commonwealth's transit commitments and goals. The Chamber has been a champion of restoring urban transit to New England's most densely populated city -- the city that is closer downtown Boston than most of the City of Boston and in the center of the Brainpower Triangle of MIT, Harvard and Tufts.

**Summary:** Herein, the Chamber supports:

(Pages 2-3)

- the simultaneous construction of the Community Path;
- the GLX to Route 16;
- the design of multimodal stations (sans parking);
- equal access to the Innerbelt Brickbottom station; and
- Union Square station design to allow a future extension to Porter Square.

The Chamber submits a special request for construction planning and mitigation efforts in Ball Square.

(Pages 3-12)

The Chamber also requests that:

- a supplemental FEIR be conducted on Option L BET in order ensure a more public, transparent, and thorough analysis of vehicle storage and maintenance solutions within existing, publicly-owned land area;

- the Design Working Group be defined and composed (with consideration of Chamber representation) to oversee said analysis; and
- a supplemental FEIR is not grounds for further GLX project delay.

### **The Community Path**

The path would help:

- increase T ridership by providing greater access to and a wider catchment area around stations
- repair the lacerations that rail lines cut through densely populated neighborhoods;
- promote walking and cycling;
- populate business districts;
- complete, with a 2.5 mile leg, a 20.5 mile regional path from Boston to Bedford.

The Chamber office is located at the current terminus of the community path at Central Street. We have seen first hand: the popularity of the path leading to the Davis Square T station; the frequency in which all bicycle “parking” in the business district is full; and the increased pedestrian population of Davis Square. While the transportation world has yet to conceive an accepted community path metric that translates into T-ridership value, all anecdotal evidence here indicates that a community path extension would not only be aesthetically pleasing compliment to the GLX but also a key component of drawing more riders. The Chamber supports the simultaneous construction of the community path.

### **Route 16**

A Route 16 station would be the best terminus for Green Line because it would serve west Somerville, Medford Hillside, and east Arlington residents. It would: provide multi-modal accessibility; increase ridership; promote economic development; and reduce vehicular traffic.

### **Multimodal stations**

The design of all stations should seek to provide the maximum multi-modal functionality – pedestrian, bicycle, bus, and kiss'n ride in an urban village context (without automobile parking facilities).

### **Equal access at Innerbelt/Brickbottom**

The Innerbelt and Brickbottom districts as well as the residential district on Washington need to be equally served by the location of the station in that area. We hope that MassDOT and the GLX Design Working Group will make every effort to site the station for ease of pedestrian access to and from all three districts.

### **Union Square future**

Between the Union and Porter Square business districts is an important mixed use Somerville and Cambridge community that was once served by commuter rail. We hope that MassDOT and the GLX Design Working Group will make every effort to site and design the Union Square station so as to facilitate the possible future extension of that GLX spur to Porter Square.

### **Ball Square**

The Chamber requests special design and construction planning and mitigation for Ball Square. Along the GLX, the Ball Square business district will be the only neighborhood business district to have its main access (Broadway) severed during construction. The Chamber asks the project work closely with business neighborhoods and that Ball Square property owners and business tenants have a special opportunity throughout the process to address planned and potential business interruption matters such as:

- demolition/construction scheduling (preferably July/August only);
- parking and traffic mitigation; and
- electrical power and food safety precautions and recovery plans.

The Chamber also asks for special consideration for Ball Square storefront improvements during the GLX construction period.

### **OPTION L**

#### **Option L and Public Participation**

In the 4<sup>th</sup> Quarter of 2009, MassDOT, a successor to the Executive Office of Transportation and Public Works (EOT or EOTPW), introduced Option L as “conceived by MassDOT.” Unfortunately, the EOT had discontinued the GLX civic advisory committee (Green Line Advisory Group) on February 3, 2009 before the introduction of Option L for the maintenance and storage site.

Part of the primary role of the Advisory Group was, according to EOT, “to review and discuss key infrastructure and options” including how “structures” such as the maintenance facility would “fit the fabric:”

The primary role of the Advisory Group is to review and discuss key information and options for making the Green Line Extension as successful a project as possible for Cambridge, Somerville, and Medford, as well as the surrounding region. This will include commenting on potential stops and stations, addressing issues of environmental justice, addressing passenger safety and accessibility, and planning for stations and structures that fit in the fabric of the neighborhoods.

The discontinuance of the advisory group short-circuited a commitment noted in the EENF (December 1, 2006) which said “EOT has made a commitment to plan and develop the project in coordination with a Citizen’s Advisory Committee (CAC) representing a broad range of public and private interests.”

The discontinuance contradicted EOT's 2007 assurances:

EOTPW is committed to a comprehensive and inclusive public participation process for this project. Efficient channeling of public and agency participation is critical as we work to provide information to stakeholders, gather information about local conditions and priorities, hear feedback on proposed alternatives and develop stakeholder support for a project strategy. EOTPW will ensure that the process remains transparent so that the public understands the decision-making process, key milestones, and ways to participate in the process.

The discontinuance of an active advisory committee contradicted 301 CMR 11.01 (1) (a) -- "The purpose of MEPA and 301 CMR 11.00 is to provide meaningful opportunities for public review of the potential environmental impacts of Projects." At the federal level, both the Transit Research Board's "TCRP Synthesis 85: Effective Use of Citizen Advisory Committees for Transit Planning and Operation" and the FHWA/FTA "Public Involvement Techniques for Transportation Decision-Making" further emphasize the importance of continuing and meaningful involvement of CACs.

The Code of Federal Regulations Title 23, Section 771.105 states it is the policy of the administration that:

(c) Public involvement and a systematic interdisciplinary approach be essential parts of the development process for proposed actions.

Without an active Green Line Advisory Group, there was only a single public hearing on the Option L matter which was held on November 18, 2009 in Cambridge. At that hearing and within the two minute allowance for testimony, the Chamber reiterated recommendations that the GLX team revisit the idea of consolidating light and heavy rail at the Boston Engine Terminal (BET) complex in Somerville and that a representative of the Executive Office of Economic Development (EOED) participate.

The Somerville Chamber of Commerce, for one, regrets the community's loss of the Green Line Advisory Group as well as the exclusion of Chamber from the recently named, but yet to be convened, Design Working Group. There is thusfar in GLX project planning a 17-month gap between the last meeting of one civic advisory group and the first meeting of another. In that interim, the MassDOT conception of Option L was introduced and determined as the "preferred alternative."

### **Option L and the Environment**

The purpose of MEPA and 301 CMR 11.00 (1) (a) is to use

...all feasible means to avoid Damage to the Environment or, to the extent Damage to the Environment cannot be avoided, to minimize and mitigate Damage to the Environment to the maximum extent practicable.

Locating maintenance and storage tracks outside an existing rail line or rail yard increases the right-of way (ROW). Increasing ROW dramatically increases environmental issues and impacts. Using existing ROW can avoid environmental impacts -- as it was stated in the DEIR Certificate "...the use of existing ROW dramatically decreases certain environmental impacts."

Avoiding the expansion of environmental issues is more widely addressed in Executive Order No. 385 which was referenced in the EENF. EO 385 states that agencies shall:

- promote, assist and pursue the rehabilitation and revitalization of infrastructure, structures, sites, and areas previously developed and still suitable for economic (re)use.
- actively engage in the development of regional infrastructure plans, if not already in place, in coordination with other Agencies and with local and regional planning entities.
- seek to minimize unnecessary loss or depletion of environmental quality and resources that might result from such activity and shall, as part of each final funding or permitting decision, make an express finding as to the consistency of such decision with the provisions of this Order.

The essence of EO 385 was reflected in the DEIR certificate that "MassDOT should work with these communities to coordinate land use planning activities and new transit operations." But contrary to EO 385, the MBTA's own land use planning and the BET ROWs were excluded from further discussion and coordination and the site, area, and infrastructure on the 43-acres were by-passed in favor of the MBTA's territorial expansion.

**Option L and Somerville's largest property owner – the T**



The big blue “T”-shaped Boston Engine Terminal (BET) is a massive, 8-acre building on the MBTA’s sprawling, tax free, 43 acre commuter rail maintenance facility complex in Somerville. It is by far the largest maintenance and storage complex in the Massachusetts system which is nation’s the 5<sup>th</sup> largest commuter rail network. The network which serves all of eastern Massachusetts does not serve Somerville with a single station. Yet, every commuter rail line into North Station lacerates this city, every north-side passenger car is maintained here – as is every locomotive in the whole system.

As the most densely populated city in New England with the least urban commercial tax base in the urban core, Somerville bears a most lopsided burden for the MBTA. By virtue of the MBTA’s scale, tax free status, and environmental impacts, there is, arguably, no more visually blighting, fiscally onerous, and environmentally noxious T equation for any other city.

The City of Somerville pays its annual MBTA assessment of \$4.6M and then some.

In this context, the following statement about avoiding “any disproportionate share of impacts” in the DEIR Certificate was heartening:

I required MassDOT to identify EJ areas and other sensitive populations, provide relevant socio-economic data, describe how the project is designed to provide fair access to stations and economic development opportunities and avoid any disproportionate share of impacts.

Nevertheless, the process has produced a finding that Somerville alone must take the maintenance and storage burden not only of that related to the Green Line Extension but also of more maintenance and storage burden related to the Green Line system at large.

In the meantime, the MBTA has not been transparent in revealing its methodology or documenting its findings relative to the use of its existing Somerville land for GLX maintenance and storage. It was stated that the technical memorandum that outlined the Maintenance Facility program and requirements was “developed in consultation with MBTA operations and vehicle maintenance staff.” But, in the GLX’s “current materials” there are no documents from MBTA operations, vehicle maintenance, or real estate staff. There are only conclusions such as:

“The MBTA states that all existing parking [foreground of picture above] is needed at the BET and that there is no extra capacity to include Green Line parking or any other Green Line functions at the BET facility.”

In neither the thousands of pages of current Green Line materials nor the hundreds of comment letters since the DEIR, is there any recorded opinion or analysis by the Massachusetts Commuter Railroad Company (MBCR). MBCR has been paid over \$1.5B to operate the MBTA’s commuter rail system. MBCR’s operations, vehicle maintenance, and ‘real estate’ staff may possess some of the most recent, direct experience in and knowledge about the commuter rail maintenance complex and its potential land use.



MBCR is a partnership of Veolia Transportation, one of Europe’s largest passenger transportation companies; Bombardier Transportation, the world’s leader in the manufacture and maintenance of passenger rail vehicles; and Alternate Concepts, a Boston-based transportation operations firm. MBCR operates and maintains the fifth largest commuter rail network in the United States under a contract with the Massachusetts Bay Transportation Authority. [MBCR Press Release January 6, 2010]

The Massachusetts system is the “largest contracted commuter rail service in the country.” <http://www.veolianorthamerica.com/case-studies/transportation/boston.htm>

[Alternate Concepts, Inc] ACI is a Boston-based transportation firm whose owners and senior staff formerly served as senior managers at the MBTA and have a working knowledge of the system and its history. <http://www.nationalcorridors.org/df2/df03292010.shtml>

The Transportation Reform Act brings the participation and coordination of light rail and commuter rail divisions squarely before MassDOT. Chapter 25 of the Acts of 2009 states that MassDOT:

...invest strategically in existing and new passenger and freight transportation infrastructure that supports sound economic development consistent with established smart growth objectives...(MassDOT has the power to) ensure regional equity related to transportation planning, construction, repair, maintenance, capital improvement, development and funding...(and MassDOT’s) office of transportation planning shall be responsible for the preparation of a comprehensive and coordinated intermodal transportation plan for the commonwealth...said plan shall ensure an equitable allocation of investments in transportation across the regions of the commonwealth.

**Option L – MassDOT’s “preferred alternative”**



MassDOT's "preferred alternative," Option L, Green Line Maintenance & Storage Facility, widens and deepens Somerville's MBTA burdens by further expanding MBTA territory. Option L would require that Somerville surrender commercial tax base, jobs, business district land and economic development potential.

Option L:

- costs taxpayers \$51M in eminent domain takings;
- threatens 300 jobs;
- threatens a \$35M loss in annual local, state, and federal taxes;
- puts the GLX on a litigious sidetrack and timetable;
- robs the City of Somerville of existing commercial tax base; and
- compromises the Innerbelt district's regional economic potential.

Throughout the GLX team's Option L materials the claim is made that the site is a "compatible location for the maintenance facility because it is in an industrial area and would be consistent with local development plans." However, the current local zoning classifications and the status of local planning indicate otherwise.

The Innerbelt Business District and Option L are zoned "Industrial A." The Somerville Zoning Ordinance says.

Section 6.1.8. IA - Industrial Districts.

Purpose. To establish and preserve areas for industrial and related uses which are not incompatible with commercial uses; uses which are most appropriately located as neighbors of industrial uses including living and studio space for artists; and uses which are necessary to service the immediate needs of industrial establishments in those areas, and accessory uses to industrial uses such as day care centers, cafeterias, health facilities, and the like.

In the case of rail maintenance and storage the Ordinance's Table of Permitted Uses Section 7.11.15 5&6 are clear about incompatibility – "Railroad terminals and yards, including operations conducted outside enclosed buildings" and "Long-term, open lot (outside an enclosed building) storage of trucks, buses, trailers, etc." are not allowed.

In planning terms, to say that a vehicle storage and maintenance facility is consistent with local development plans is grossly misleading. The City of Somerville is only scheduled to begin its master planning process this fall. To suggest that such a facility is consistent with local development is presumptuous and runs completely against a clear current of community desires for urban, transit oriented, mixed use development for the area. Throughout the GLX, MassDOT itself has emphasized the key half-mile-radius catchment areas around stations. The proposed Option L footprint falls within the catchment area of the proposed Innerbelt/Brickbottom station.

According to existing zoning regulations and pre-planning community sentiments, the vehicle storage and maintenance belongs in the "isolation" of the "Industrial B" zone.



Section 6.1.9. IB - Industrial Districts. Purpose. To establish and preserve areas for necessary industrial and related uses of such a nature that they require isolation from many other kinds of land uses...

On the proposed Option L, we remain unconvinced. We believe that MassDOT needs to clearly demonstrate that it cannot indeed make better use of existing rail land. We believe the Yard 8 option proved that such a noxious activity belongs nowhere near residents. We believe that Option L will prove to everyone to be too costly and take too much time. We reiterate our longstanding question – why not your land? Explanations thus far have included no documented engineering objections.

**OPTION L BET**

	<b>Legend</b> <b>OPTION L BET →</b>  Legend
<b>A</b>	Existing MBTA Boston Engine Terminal
<b>B</b>	New Parking Lot & Deck (300+ spaces)
<b>C</b>	New Repair & Maintenance Facility
<b>D</b>	Maintains Wiley Track
<b>E</b>	Maintains Pan Am Railway & CSX Grand Junction Tracks
<b>F</b>	Allows for Vehicle Storage Yard (67 cars)
<b>G</b>	Allows for Innerbelt - Northpoint Bridge



In the meantime, we are encouraged by efforts of a lone, independent engineer, Stephen Kaiser, who has been sending MassDOT his feasibility plan. “**Option L BET**” uses MBTA land and minimizes takings. It appears to be remarkable for the potential to satisfy requirements at a lower taxpayer cost and on a faster timeline. This concept has a logical zoning of employee parking, the maintenance facility, and vehicle storage.

By simply matching use to existing land use such a remedy can:

- save taxpayers millions of dollars by reducing eminent domain takings;
- sooner meet maintenance/storage needs for the overall project;
- save the City of Somerville existing commercial tax base;
- save union jobs at a fifth generation, family-owned local business generating \$35M per year in local, state, and federal taxes and employing 330 people;

Such a remedy can:

- better protect Brickbottom artists from environmental degradation; and
- unlock the Innerbelt district’s regional economic potential.

A \$1B+ public infrastructure project deserves a coherent economic development plan. This \$1B project should require the logical, economical & optimal use of rail land that the Commonwealth already owns.

### **Option L BET - Site**

Option L BET is along the northwest fringe of the MBTA’s Commuter Rail maintenance facility, also referred to as the Boston Engine Terminal (BET). Option L BET is immediately adjacent to the southern and southeastern fringe of the existing Inner Belt business district of Somerville. The layout of yards and buildings is in an “L” shape and is between the relocated Wiley Track and CSX Grand Junction track just west and northwest of the MBTA’s BET.

### **Option L BET - Program**

Option L BET accommodates the same defined support facility program as Yard 8, including but not limited to: storage for 80 Green Line vehicles, two pit tracks, two lift tracks, one wheel truer track, support shops, Green Line vehicle wash, administrative office space, and an approximately 300 space parking facility (100-space GLX employee parking; 200-space BET employee parking). .

The maintenance building and associated track work are proposed on land within relocated Valley Tracks on part of the existing BET surface parking lot next to the BET facility. The vehicle storage yard is proposed southwest of the GLX maintenance building on land within the relocated Valley Tracks.

The layout of Option L BET includes one storage yard and the maintenance building. The yard is immediately south of 70 Inner Belt Road. This yard includes fifteen storage tracks and a runaround track. The yard would store up to 67 cars. For Option L BET, 13 cars would need to be stored in the building or tracks just outside the buildings at any given time in order to meet program storage requirements.

The maintenance building for Option L BET would be identical in size to the building proposed for Yard 8 and Mirror H. The main differences would be the layout of offices and storage within the building and the location.

To provide double-ended access to the maintenance building, a loop track is added which provides access to the north side of the building from a runaround track to the east of the building and the south storage yard.

This alternative could accommodate potential future air rights development.

### **Option L BET - Impacts to Existing Railroad Operations**

Option L BET would not impact Pan Am Railways' freight operations to the same degree as Option L and Yard 8. Option L BET would not require the removal of the Wiley Track which connects the south end of Yard 8 to the Valley Tracks. With the Wiley Track preserved, M.S. Walker, a current freight customer of Pan Am Railways, is a business that would not have to be relocated to make room for the Green Line maintenance facility. Option L BET would not have any impacts on revenue passenger operations or on operations associated with the MBTA (e.g., vehicle storage and maintenance, maintenance-of-way). Option L BET would have no impacts on existing CSX operations between the Grand Junction Branch and the Valley Tracks. Option L BET would not preclude the future North-South Rail Link project. Option L BET would limit the ability to expand the BET facility within existing MBTA property limits.

### **Option L BET - Real Estate Impacts**

Option L BET would require only partial acquisition of two parcels. The land required for the yard and maintenance facility includes land and some parking at 20 Third Avenue; and the isolated parking lot for 70 Inner Belt Road. This alternative requires the acquisition of approximately 3.2 acres of land which has been estimated at approximately \$4 million (including site cleanup). This cost could be refined with additional research. These acquisitions would represent a minimal loss of current tax revenue to Somerville as the MBTA is exempt from local property taxes. This alternative could minimize the loss of current and potential tax revenue which would be generated by future development at this location.

### **Option L BET - Potential Property Acquisitions**

20 Third Avenue, Somerville M.S. Walker Wholesale Distribution: 2.0 Partial

70 Inner Belt Road, Somerville CRG West Parking Lot: 1.2 Partial

***TOTAL 3.2 acres***

### **Option L BET - Order-of-Magnitude Capital Costs**

An Order-of-Magnitude conceptual capital cost estimate for the proposed maintenance and storage facility at Option L BET was developed based on MassDOT's Option L estimates and is estimated to be approximately, in 2008 dollars, \$98 million vs. Option L's \$129M.

<b>Order-of Magnitude Capital Cost Estimates (\$ 2008)</b>		
	<b>Option L</b> <i>By MassDOT</i>	<b>Option L BET</b> By Kaiser/Moore/Mackey prelim
Real Estate Acquisition	\$ 51M	\$ 4M
Building	\$ 38M	\$ 38M
Track	\$ 33M	\$ 40M
Infrastructure	\$ 2M	\$ 2M
Earthwork	\$ 5M	\$ 6M
Parking Structure	\$ 0M	\$ 8M
Total (Approximate)	\$129M	\$ 98M

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The Chamber requests a supplemental FEIR of limited scope in consideration of Option L BET or similar BET site to ensure MassDOT's compliance with the various factors, laws, executive orders, and policies cited above. A focused and speedy supplemental FEIR would ensure a more public, transparent, and thorough analysis of vehicle storage and maintenance solutions within existing, publicly-owned land area. The definition and composition of the Design Working Group (with consideration of Chamber representation) would facilitate and advance such action and would not be grounds for further GLX project delay.

Sincerely,

Stephen V. Mackey  
President/CEO