

November 20, 2006

Secretary Robert W. Gollodge, Jr.
EEOA, Attn: MEPA Office
Deirdre Buckley, EEOA No. 13886
100 Cambridge Street, Suite 900
Boston MA 02114-2524

Subject: Comments on EEOA #13886
Green Line Extension EENF

Dear Mr. Gollodge:

We have reviewed the document titled *Green Line Extension Expanded Environmental Notification Form (EENF)* dated October 2006, and have attended Public Scoping Sessions on the Green Line Extension held in Somerville on October 16, 2006 and in Medford on November 15, 2006. Based on our review of the EENF and information obtained at the public scoping sessions, we offer the following comments on the scope of the environmental impact report (EIR) to be prepared for this project in accordance with the MEPA process:

1. Developing the appropriate location and layout of the stations along the proposed extension of the Green line are critical to the long-term success of this project. Accordingly, we believe it to be critically important that both a draft and final EIR be prepared for this project. The public needs to have an opportunity to review and comment on planning-level layouts of the stations at the proposed locations. Equally importantly, however, the public also needs to see how the project proponent responds to comments on the proposed station locations and layouts. Providing both a draft and final document would allow this iterative comment/response cycle to occur. While this approach may somewhat prolong the planning process, in the long run it may shorten the overall project implementation schedule if it helps avoid citizen actions once the project moves into design.
- I-058-001 2. Since the locations of the stations are so important to the success of this project, the project area should be extended to Route 16 in Medford. Based on statements made at the scoping sessions, it appears that a station in the vicinity of Wild Oats would have certain advantages and disadvantages. It would be prudent to conduct detailed engineering studies to further define the benefits and impacts of a station at this location, so that the decision on the location of the terminus can be made in a rational manner, with benefits and impacts fairly weighed. Given the approximately \$550 million cost of this project, the front-end planning and engineering should not be short-changed.
- I-058-002 3. The EENF references a reduction of 9,660 person trips under the Traffic Impacts and Permits section. A footnote indicates that this number is based on Alternative 1C of the MIS/AA, "which most closely reflects the preferred alternative". However, under Alternative 1C, the Green Line would be extended all the way to the West Medford commuter rail station. By all accounts, the currently-proposed project would not extend past Route 16. At the public scoping sessions, many residents expressed skepticism of the reduction in person trips. The EIR should refine the reduction in person trips based on the actually-proposed terminus of the Green Line extension. It may be that the reduction in person trips could be a differentiator in siting the terminus at Route 16 versus Winthrop Street. The reduction in air pollution loads associated with the reduction in person-trips should also be refined.
- I-058-003

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I-058-001

As required by the Secretary's Certificate on the EENF, a potential terminus station at Mystic Valley Parkway/Route 16 has been considered for this project and is described in Section 3.6, *Build Alternatives*.

I-058-002

Updated ridership and person trip estimates are provided in Chapter 3 (Alternatives) Section 3.6, *Build Alternatives* and in Chapter 5 (Environmental Consequences) Section 5.5, *Traffic* of the DEIR/EA. These estimates are reflective of changes made to the proposed alternatives since the MIS/AA.

I-058-003

The air quality mesoscale (regional) and microscale (local) air quality analyses included the impacts of reduction of person-trips due to the proposed project and is presented in Section 5.6, *Air Quality* of the DEIR/EA.

- I-058-004 | 4. The EIR should consider the extent to which ridership could be enhanced through enhancements of bike trails and pedestrian facilities. This point may also be a factor in assessing the appropriate location for the terminus.
- I-058-005 | 5. The EENF seems to downplay the potential for encountering hazardous materials. However, soil along railroad rights of way often can often be contaminated from fluids leaking from the locomotives. It seems likely that relocation of the existing commuter rail tracks and installation of the new Green Line tracks will involve some excavation, as would the construction of new bridge abutments and installation of new storm drains. The EIR should include further investigation of the soils along the right of way to better characterize the potential for encountering contaminated material, and to identify approaches and the cost to mitigate the contamination during construction.
- I-058-006 | 6. The Historical and Archaeological Resources section of the EENF identifies the Susan Russell House as the only historical resource in the project area. A commenter at the November 15, 2006 scoping session stated that work is underway to define a proposed Middlesex Canal Historical District. The EIR should investigate the status of this proposed historical district, and assess the potential impact of the granting of historical district status for this area on the Green Line project.
- I-058-007 | 7. Public notifications related to the Green Line project should be posted in the Medford Transcript.
- I-058-008 | 8. It would appear that one of the biggest challenges for the station layouts will be in providing handicap access. The EIR should evaluate a range of alternatives for meeting ADA requirements on a station-specific basis, taking into consideration local topography and long-term maintenance costs.
- I-058-009 | 9. The need to replace or enlarge bridges must be more clearly defined in the EIR. Similarly, the potential traffic impacts of the bridge replacement work must be defined, along with an approach to sequencing of bridge construction to mitigate traffic impacts.
- I-058-010 | 10. In refining the project costs in the EIR, the potential impact on the annual MBTA assessment to the cities of Medford and Somerville should be identified.
- I-058-011 | 11. The EIR should identify and evaluate alternatives to locate the station on the Union Square branch closer to the heart of Union Square. Similar to the question of the Route 16 terminus, the decision whether or not to locate closer to Union Square should be based on a fair weighing of benefits and impacts supported by engineering evaluations.
- I-058-012 | 12. The EIR should evaluate noise impacts related to retaining wall construction and potential loss of trees, and should evaluate lighting impacts to abutters in the vicinity of the stations. Will the stations be lit all night for security purposes? Vibration impacts should also be assessed.
- I-058-015 | 13. The EIR must include detailed traffic studies to assess impacts to the neighborhoods in the vicinity of the stations, as well as potential changes to existing bus routes. Approaches to parking enforcement should be identified and evaluated.
- I-058-016 | 14. As was stated by public officials at the two scoping sessions, the public notification and review process must continue to include the residents of Medford, and we would expect to see continued outreach to Medford residents during the facilities planning process.

I-058-004

There is an opportunity to integrate the proposed Somerville Community Path's neighborhood connections into the Green Line Extension stations. The Green Line Extension Project has been coordinated with the proposed Somerville Community Path project for compatibility. In addition to the Somerville Community Path, the Green Line Extension Project has been coordinating the physical integration of the Mystic Valley Parkway Path with the proposed station at Mystic Valley Parkway/Route 16, which can help encourage safe and multi-modal access between these two uses. These multi-use community pathways are further discussed in Section 3.8, *Community Paths* of the DEIR/EA.

I-058-005

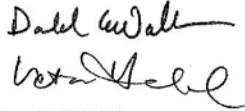
Phase 1 hazardous materials investigations were performed in order to identify possible contamination in soil and groundwater that may be exposed or encountered during the construction of the Project. Proper handling, treatment, and disposal procedures for hazardous materials will be in place to address both known and unexpected contamination encountered during construction. During the preliminary engineering phase, subsurface investigations will be performed on all areas of expected soil disturbance to identify any additional areas of contamination. The hazardous sites identified are discussed in Chapter 4 (Affected Environment) Section 4.16, *Hazardous Materials*, and potential impacts to these contaminated sites under each alternative are discussed in Chapter 5 (Environmental Consequences) Section 5.14, *Hazardous Materials* of the DEIR/EA.

I-058-006

Your comment has been addressed in Chapter 4 (Affected Environment) Section 4.15 and Chapter 5 (Environmental Consequences), Section 5.13, *Historic and Archaeological Resources* of the DEIR/EA.

We appreciate the opportunity to comment on this important project, and we look forward to continued involvement in the planning process. We support the expansion of public transportation to Medford.

Very truly yours,



Donald E. Walker
Victoria A. Halal
11 Mason Street
Medford, MA 02155

cc: Senator P. Jehlen
Representative C. Sciorlino

I-058-007

Display ads have been placed in The Medford Transcript in advance of community meetings.

I-058-008

All of the proposed Green Line stations have been designed to fully accommodate ADA requirements. Additional information can be found in Chapter 3 (Alternatives), Section 3.7.3, *Stations* of the DEIR/EA.

I-058-009

Details on construction and associated mitigation are provided in Section 3.7.6, *Construction Sequencing and Staging* of the DEIR/EA. Section 3.7.2, *Affected Bridges* provides a definitive breakdown of bridge reconstruction required for each alternative.

I-058-010

All municipalities in the MBTA district are charged an assessment for the transit benefits they receive. This assessment is based on population, not on the amount of service a municipality receives, and it will not change based on any increase in service. The assessment would only increase with an increase in a municipality's population, and the total assessment charge to all communities can grow no more than 2.5 percent per year. More substantial changes to a municipality's assessment can only occur through an act of the Legislature.

I-058-011

An in-street running alternative for the Union Square Branch via Monsignor O'Brien Highway, McGrath Highway and Somerville Avenue was evaluated early in the project and is described in detail in Appendix B of the DEIR/EA. This analysis concluded that the in-street alternative that brought the Union Square Branch directly into the "heart" of Union Square was not feasible due to its impacts on traffic, parking,

pedestrian safety and transit operations/reliability. As such, a single-track "loop" alternative, with portions of in-street running and a station located along Prospect Street, was evaluated as part of the DEIR/EA and is described in more detail in Chapter 3 (Alternatives). However, due to the impacts on traffic, property and transit operations on this "loop" option, it was determined that the Union Square Branch alternative that operates exclusively within the MBTA's Fitchburg Commuter Rail Line is part of the Preferred Alternative. From this route, tunneling beyond the proposed terminus to get closer to the center of Union Square was determined to be cost-prohibitive.

I-058-012

Construction noise would be temporary and would occur during daytime hours to the greatest extent practicable to prevent nighttime noise in residential areas. Some trees would be removed from the edges of the right-of-way, but noise barriers and other noise mitigation would be provided to prevent any long-term noise impacts to residences or other sensitive receptors. The new retaining walls would include replacement vegetation as well as noise barriers where needed. Much of the retaining wall and noise barrier construction is expected to be completed early in the overall construction duration and as such the noise barriers will be in place before the Green Line track and station construction is underway. Noise and vibration impacts are discussed in Section 5.7, *Noise*, and Section 5.8, *Vibration* of the DEIR/EA, respectively.

I-058-013

Lighting impacts are expected to be minor given the existing urban environment. Lighting will be designed to be downward, and any lighting impacts will be assessed and mitigated on a case-by-case impacts.

Station designs will minimize light pollution to surrounding neighborhood of each station, while ensuring that adequate safety lightings measures

are adhered to. Lighting designs are discussed in Section 3.6.3, *Stations* of the DEIR/EA.

I-058-014

Potential vibration impact are assessed in Section 5.8, *Vibration* of the DEIR/EA.

I-058-015

Components of the transportation study addressing traffic and parking can be found in Chapter 4 (Affected Environment) Section 4.6, and Chapter 5 (Environmental Consequences) Section 5.5, *Traffic* of the DEIR/EA. There are no proposed changes to existing bus routes as part of the Green Line Project as discussed in 5.5.1.5, *Public Bus Transportation* of the DEIR/EA.

I-058-016

The Green Line Extension Project has engaged in a full and comprehensive public process for citizens in each of the affected communities, including Medford. Please see Section 1.5, *Public Involvement and Agency Coordination* of the DEIR/EA for a complete description of this process.

Buckley, Deirdre (ENV)

From: Lynn Wiles [lynnwiles@comcast.net]
Sent: Saturday, October 14, 2006 9:57 AM
To: Buckley, Deirdre (ENV)
Subject: EOEA Project No. 13886

Deirdre Buckley,
I will not be able to attend Monday night's meeting on the Green Line Extension, so I thought I should write to you with my concerns. I do think that extending the Green Line in to Somerville and parts of Medford would be a great improvement to mass transit in this area.

I-059-001 My concern is for the areas where there are a lot of houses abutting the tracks. I live in the area between School St and Central, where houses line each side, but believe that there are a few other places in Somerville (Boston Ave) and in Medford (near Winthrop St) that also abut the tracks.

I-059-002 Specific concerns are noise pollution and the destruction of a green space that is habitat for urban birds and animals. For those of us who have 9-5 M-F jobs, there's a rush hour during the week, with a fair number of commuter rail trains running, but for most of the rest of the time, it's very quiet here. If the Green Line starts running every 4 minutes in each direction, we would be exposed to almost constant noise from 5:30 am to 1:00 am. On my side, we have some protection / noise abatement of

I-059-003 commuter rail and the Downeaster from the growth of very tall old maple trees. I've heard that all of the trees would have to be removed to build a restraining wall. Those trees are a habitat for many birds and animals and they are beautiful trees. In such a densely populated area as Somerville, it is a real treat to live in such a urban green space and that certainly makes up for the current noise from the commuter rail.

I-059-004 I've heard of the possibility of covering the tracks in some areas, putting the bike path on top and replanting the area with large trees. Is this being considered?
Thank you,
Lynn Wiles
9 Montrose Court
Somerville, MA 02143
617-776-1560

I-059-001

Potential noise and vibration impact are assessed in Chapter 5 (Environmental Consequences) Sections 5.7, *Noise* and 5.8, *Vibration* of the DEIR/EA, respectively. This assessment considers the number and time of day of proposed transit operations.

I-059-002

Potential noise and vibration impact are assessed in Chapter 5 (Environmental Consequences) Sections 5.7, *Noise* and 5.8, *Vibration* of the DEIR/EA, respectively. This assessment considers the number and time of day of proposed transit operations.

I-059-003

Impacts to vegetation and wildlife habitat are discussed in Chapter 5 (Environmental Consequences) Section 5.10, *Fish, Wildlife, and Plants* of the DEIR/EA.

I-059-004

The Somerville Community Path has been conceptually designed to travel parallel to the MBTA's Lowell Line right-of-way. The construction of a deck over the railroad corridor has been considered and would be costly to the project, therefore, tunneling or decking of the railroad right-of-way have been removed from consideration.