



January 8, 2010

Secretary Ian A. Bowles
Executive Office of Energy and Environmental Affairs (EOEEA)
Attn: MEPA Office
Ms. Holly Johnson.
100 Cambridge Street, Suite 900
Boston, MA 02114

Re: MEPA No. 13886
Green Line Extension Project, Cambridge/Somerville/Medford
Draft Environmental Impact Report/Environmental Assessment (DEIR/EA)

Dear Secretary Bowles:

WalkBoston appreciates the opportunity to provide comments on the Draft Environmental Impact Report/Environmental Assessment (DEIR/EA) for the Green Line Extension Project in Cambridge, Somerville and Medford, MA. The plan is an exciting addition to the corridor, as it provides new transit access in a very densely built urban area where transit is likely to quickly become a principal mode of travel for many residents.

Pedestrian access to the transit stations is of great consequence if the project is to prosper and serve its riders well. The need for good walking access is strongly reinforced by the lack of parking at the stations. In addition, the provision of the Community Path along the right-of-way will draw walkers from greater distances than might otherwise be expected. The proposed path is similar to other successful joint transit-walk-bike routes in metro Boston, the Davis-Alewife Linear Path and the Southwest Corridor Path.

A summary of our comments is provided below and followed by detailed station area comments.

1. Integrate the construction of the Community Path with the Green Line Extension project to ensure completion of the Path. The Path will generate a significant number of walk-in transit trips – exactly the outcome that is desired by the community, the MBTA and the FTA.
2. Extend the Green Line to Route 16 because new transit service should be provided to this densely developed portion of the metro area. Additional walking options are needed for access to the station by people walking from nearby portions of West Medford.
3. Provide good pedestrian access from all directions into the stations. (A best-practice example of pedestrian access is Davis Square Station, where access is provided by the east-west Community Path and north-south by the local streets intersecting the Community Path.)
 - East-West access to most of the stations along the Green Line will be served by the east-west Community Path parallel to the tracks.
 - North-South access for most of the stations can only be provided via intersecting streets, and should be maximized to encourage pedestrians.

- Stations that do not presently connect directly to the street network should be provided with additional pedestrian access to supplement that provided by the Community Path.
4. Design direct pedestrian connections and avoid circuitous routes to the stations.
 - Minimize the number of street crossings required for pedestrians to access Green Line Stations through several points of entry and exit at the surrounding streets.
 - Design stations for locations at the intersections of major streets, rather than mid-block.
 - Construct straddling stations with head houses on both sides of the street to allow direct access to the stations. Such a design avoids dangerous pedestrian crossings and unnecessary traffic delays on the street (especially important at Brickbottom Station).
 5. Provide safe pedestrian street crossings at all locations at each station.
 - Wherever possible provide station access that does not require multiple street crossings.
 - Consider providing speed tables in many locations to create safer crossings.
 - Provide wide crosswalks and create median refuge islands at locations where pedestrians must cross several lanes of traffic or at especially busy streets.
 - Ensure that signal timing is set so that pedestrian waits to cross do not exceed 30 seconds.
 6. Use projected pedestrian traffic counts to determine appropriate sidewalk widths.
 - Widen and improve nearby sidewalks (now eligible for FTA funding) to encourage nearby residents and workers to walk to stations.
 - Provide wide and gracious sidewalks in locations with high pedestrian volumes (e.g. Lechmere Station).
 7. Based on the grades of surrounding streets, provide at least one “very handicapped-friendly” route to each station.
 8. Plan for changing needs and uses along the Green Line.
 - Envisage future uses of air rights along the ROW, especially at Gilman Square Station.
 - Accommodate for future station locations such as an intermediate stop between Lechmere and Brickbottom in the Inner Belt area and near the Twin City Plaza. Zone for new development within 1/4 mile walking distance of a station to ensure that travelers will choose transit.

Our detailed comments are provided below.

Continuity of the Community Path

WalkBoston supports the construction of the Community Path and the integration of its design and construction with the Green Line. We believe that the Community Path is essential for good pedestrian station access in the neighborhoods of Cambridge, Somerville and Medford.

The Community Path is located along the west side of the project and within the existing right-of-way. The Path extends between Lowell Street, where it connects to the existing Community Path, to the Brickbottom area. North of Lowell Street, no path is planned because of right-of-way constraints.

In the Brickbottom area, the Community Path must cross to the east side of the Green Line to connect to the North Point paths that then connect to the Charles River path network. There are several ways to accomplish this crossover. One is to continue the Path along the west side of

the Green Line, pass over the replacement of the Red Bridge and descend to Water Street, pass under the Green Line viaduct and connect to North Point. A second possibility is to cross the Green Line at the Brickbottom Station, and connect through the Inner Belt area by following the alignment of a new roadway to be constructed over the commuter rail line to connect with Water Street in Cambridge. We think that the most practical solution is to construct the new Path along with the Green Line Extension and to use the Red Bridge replacement as route that connects to Water Street. This route does not depend on the possibility of a bridge that will be built over the Lowell and Fitchburg commuter rail lines at some time in the future. Building the Path along with the Green Line assures that it will be completed, while not precluding a branch of the Path connecting through the Inner Belt area in the future. Keeping the Community Path alignment on the west side of the Green Line in the vicinity of the Red Bridge replacement facility also retains the possibility of a future branch of the Path into Union Square and to the possible Grand Junction Path.

The option of crossing the Community Path to the east side of the tracks at Brickbottom Station should be retained. This routing allows for potential future connections of the Community Path through this area and complements the possibility that Somerville may want to allow more intensive development in this area. The connection beneath Brickbottom Station provides better access in all directions from the station and should be retained as a good investment with significant future development potential.

Lechmere Station – Street-level access for pedestrians

The proposed location for the new Lechmere Station was chosen in part to modernize access to the Green Line and to foster new development in the North Point area. New privately financed buildings around the station include dense residential and employment uses that will house more riders for the Green Line. As more housing and job sites develop, the new station location may ultimately be more centrally located to walk-in traffic than it would be if it opened today.

The walking barrier created by Monsignor O'Brien Highway/Route 28 means that the new location is less convenient for many existing station users. Although it adds only a few additional feet beyond the location of the existing station, it requires crossing O'Brien Highway which is a very busy arterial street. This adds as much as one minute to the walking time for each Green Line rider coming from existing East Cambridge residential and business areas, and requires using the new First Street Extended intersection with O'Brien Highway. Adding to the traffic at this location is the proposed diversion of vehicles from Cambridge Street which is to be partially abandoned between First Street and O'Brien Highway. This means additional traffic will pass through the intersection with increased and potentially heavy turning movements.

The design of the new roadways in the vicinity of Lechmere Station creates a complex set of intersections where pedestrians must cross the highway. Assuming that current patronage levels are maintained or increased, this will mean that a significant number of pedestrians will pass through these intersections on a daily basis. In the current design, it appears that virtually all walk-in Green Line patrons at the new Lechmere Station will need to cross First Street where it crosses O'Brien Highway. Some additional pedestrian crossings are envisioned for the intersections of O'Brien Highway at Second Street/Water Street and at Third Street.

The heavy traffic along O'Brien Highway suggests that special precautions will be needed for pedestrians going to or from the Lechmere Station. Because of the heavy traffic, protection for pedestrians at all crosswalk locations should include extra-wide crosswalks and pedestrian-

phase signals that are carefully timed to permit pedestrians to safely cross the full width of the highway. Additional signage and, potentially, some new forms of warning lights or refuge islands should be explored. Signage might indicate preferential routes – those that are the fastest. Waits to cross these two streets should never exceed 20-30 seconds. We encourage exploration of crosswalks up to 50 feet wide to promote visibility and awareness of pedestrians at the crossing. It is essential to undertake a detailed design and review of the pedestrian safety precautions that will be added to new and old intersections as the project moves forward.

The sidewalks in the vicinity of the new station should also be built with sufficient capacity to handle future foot traffic. For example, if pedestrians can be encouraged to cross O'Brien Highway at Second or Third Street instead of First Street, they should be provided with wide crosswalks and wide sidewalks (in particular the frontage along O'Brien Highway between First and Third Streets) that lead into the station site, including the sidewalks that will serve as bus boarding or alighting locations. Perhaps the crossing at Water Street should be emphasized as the physical extension of Second Street with a wider sidewalk along Water Street. This would set the stage for improved pedestrian connections on the sections of Second and Third Streets as they link from the highway back into the residential portions of East Cambridge. The widest of all the sidewalks should be along the west side of First Street Extended between O'Brien Highway and the entrance to the station where pedestrian volumes are likely to be concentrated.

The proposal for reuse of the existing Lechmere Station property is part of the overall project. Design of the land that is released by moving the station should consider pedestrian activity. One such proposal is based on provision of an open public market, perhaps reusing existing station structures. As a pedestrian feature this would be a very desirable addition to the area. Design attention should be focused on the way pedestrian paths through the former station site might most directly serve the new station, perhaps providing shortcuts or safer and more attractive routes than the sidewalks. If the station is demolished rather than preserved, the large empty lot created through the relocation of Lechmere Station will act as a significant psychological barrier to walking to the station from the East Cambridge area. Considering that development of this site would occur only in the long-term, a temporary wall with a community mural or other artwork would help in the interim.

Lechmere Station – direct pedestrian access to train and bus connections

The present plan calls for an elevated station for rail access and, beneath it, a long sidewalk/loading and unloading area for buses. Anticipated volumes of transit patrons strongly suggest that a full array of pedestrian access - escalators, elevators and stairs - are required. Since much of the pedestrian traffic will be using First Street Extended, numerous ground-level entrances and exits to the station will be essential to accommodate the flow. Foot traffic between the rail line and buses will also need comfortable and safe accommodation for pedestrians at ground level. Perhaps because of the scale of the preliminary drawings, the bus-rail connecting sidewalks appear rather narrow and seem to be obstructed by posts. The internal portions of the station at ground level also seem rather minimal and appear pinched.

Brickbottom Station

This station is designed to serve the existing Brickbottom area (potentially a focus for intensive future development), the Inner Belt area, and the extensive East Somerville neighborhood to the north and east. East Somerville is an environmental justice area, deserving of special consideration in terms of its access to the transit station.

The proposed location for the Brickbottom Station is at some distance from Washington Street, which would appear to be the main feeder street for pedestrian access from nearly all of the surrounding residential areas. The station should be closer to the bridge over Washington Street to maximize access to exchanges to and from buses that are routed there. Locating the station closer to Washington Street would also reduce walking distances to the East Somerville neighborhood.

One concept worth exploring is a station design that straddles Washington Street, with individual headhouses and stairways located on either side of Washington Street to provide better pedestrian access from the existing densely built area to the north and the future densely built areas south of Washington St. This may be a particularly important option if the Bridge over Washington Street is to be rebuilt.

Locating the new Brickbottom Station closer to Washington Street also offers the future opportunity for an additional station to be built near the Red Bridge replacement. Such a future bridge may become important, depending on the success of redevelopment of the Inner Belt/North Point/Brickbottom areas – all destined to become more intensively used.

If a station cannot be constructed to straddle Washington Street, special attention should be given to the pedestrian crossings of Washington Street. A major pedestrian crosswalk and signals may be required at the Tufts Street/Washington Street intersection at the edge of East Somerville, which is a likely candidate for significant foot traffic.

Gilman Square Station

The design of this station must include potential pedestrian use in and around the future transit station. Located mid-stream within a large city block bounded by Highland Avenue, School Street, Medford Street and Walnut Street, the station's principal pedestrian connections are to the community path which passes between School and Medford Streets and a direct connection at the Medford Street side of the block. Because of a significant change in grade, the station is not connected to the immediately adjacent Somerville City Hall, High School and Public Library, all facing Central Hill Park. The Community Path along the new Green Line is also not connected to the city buildings in this important location.

Gilman Square is one of the few stations that has better access to and from the north side of the tracks than to and from the south side of the tracks, an oversight in design which should be fixed by reexamining this city block. A significant number of Somerville residents, and many High School students, are likely to use this station. A critical connection that the new Green Line will provide is between the High School and the City's sports fields, none of which are located at the school. The Green Line can provide direct access for students to travel between the high school and Trum Field, close to the proposed Ball Square station. All citizens will have better access to City Hall and the Public Library if a better connection up the hill can be constructed.

Perhaps a connection to the city buildings can be designed to link Pearl Street and Medford Street on the north side of the block passing physically through the station and up the hill to the city buildings. This would connect to Highland Avenue and provide a new means of access for residents south of the city buildings and Central Hill Park. Perhaps the connection could be provided by redesigning the station's elevator and stairs to serve the dual purposes of station access and helping to move people up the hill. As an initial step, access might be improved by

extending the bridge from Medford Street above the Gilman Square Station across the full width of the tracks into the city-owned land south of the right-of-way.

Additional consideration should be given to providing a fully accessible connection between the Community Path and Highland Avenue. Wheelchair use of School Street is severely restrained by the steep grade of the street, and good access should be provided to municipal buildings. Better pedestrian connections between the Community Path and the City Hall/High School/Library complex can improve this situation.

The Gilman Square Station location also should be reviewed in light of potential future use of air rights. While diesel locomotives on the commuter rail and freight tracks may make it difficult to fully enclose the tracks, it might be possible to have a partial enclosure (this has been done in other locations in the region). An air rights development at this location would benefit the city complex of buildings at the top of the hill, providing space for additional open space or buildings. Outdoor playing fields serving the nearby High School might be very useful because at present students must travel across town to reach any outdoor sports facilities.

Lowell Street Station

The proposed station on Lowell Street provides pedestrian access north-south along Lowell Street and east-west along the Community Path. This layout provides straightforward pedestrian access in all directions.

One design detail requiring careful attention is that access from the Community Path comes from the lower level and reaches street level directly across from Lowell Street from the station. This requires pedestrians to cross the street at grade and will require a wide crosswalk combined with a traffic signal or warning signs and lights to make it safe.

Ball Square Station

The Community Path does not extend this far. Pedestrian access along the west side of the tracks is provided by Boston Avenue which parallels the tracks and connects many of the residential streets both north and south of Broadway. The situation for pedestrian access north of the tracks is not as clear. All pedestrians north of the tracks – primarily from Medford - will need to use either Broadway or Colby Street to reach the Ball Square Station. Residents living near Cedar Street in Somerville also have fairly indirect pedestrian access to the station.

Pull-offs for buses and for drop-off traffic should be provided along Broadway in front of the station. A crosswalk on Broadway must be provided for bus riders and drop-offs to cross the street, and consideration should be given to signalization and/or a pedestrian refuge island to help protect pedestrians. The street is very wide, and traffic can frequently move rapidly. Pedestrian safety warrants careful analysis of the routes into the station.

College Avenue Station

The College Avenue Station is located at the intersection of College Avenue and Boston Avenue – a busy intersection with Tufts University buildings and facilities on all four corners on both sides of the tracks. The station seems destined to become a major focus of the university because of its convenient location.

Transit riders to and from Tufts and all pedestrians moving between the university buildings around this intersection will walk along College Avenue. Although the center of the campus is

not far from College Avenue, it is located atop a hill that requires long paths and/or stairs to reach. Pedestrians walking along College Avenue may encounter some issues because of the relatively narrow sidewalk along this street, hemmed in by a college wrought iron and brick-pillared fence. Although outside the scope of this project, Tufts may want to consider widening this sidewalk or perhaps seeking new means of access between the campus center and Boston Avenue /College Avenue from other directions or with other paths/stairs. The proposed street improvements to be made at the intersection as part of the project should provide for future wider sidewalks along College Avenue.

Bus access to the station is also constrained by the location of the stops on College Avenue south of Boston Avenue. Moving at least one of the stops closer to the intersection, on Boston Avenue just across from the station should be considered because it would shorten the walk from the bus to the station for transit riders and perhaps enhance ridership.

Drop-off areas for the station could be improved. The current plan shows a limited space on the north side of Boston Avenue adjacent to the station entrance. A similar drop-off spot on the south side of Boston Avenue traffic would be useful. Two access points for one station would help during inclement weather and provide more convenient transfer between private vehicles and buses.

North of the tracks, the residential area is cut off from direct access to College Avenue by Tufts University buildings. One way to help circulation between the residential district north of the tracks and the Station would be to find a route through Tufts properties from the end of Burget Avenue to College Avenue. Physically the space appears to be available, but it will be up to the University to examine and perhaps institute this improvement.

Route 16/Mystic Valley Parkway Station

The proposed terminus of the Green Line Extension is a station located at one side of a city block bounded by Boston Avenue, Mystic Valley Parkway, Auburn Street and North Street. The proposed station entrance is immediately adjacent to the Parkway on a service road that loops in from Boston Avenue. The station location has limited pedestrian access. The highway is crowded and busy. North of the river residents have access to the commuter rail line at West Medford and may not be a primary market for this station. South of the river, the residences surrounding the station site are provided access only via the Parkway entrance and the access road off Boston Avenue. From a pedestrian point-of-view, North Street is perhaps a preferable walking route. It runs through the residential neighborhood, connecting to many of the likely riders of the new line. However, access from North Street is presently limited to its connection to Boston Avenue and to the access driveway to the station – resulting in a very indirect set of physical connections.

The proposed head house is located directly on Mystic Valley Parkway, a symbolic location which will certainly assist pedestrians in reaching the station from that street. However, access for pedestrians from all other directions is secondary to vehicle access. Boston Avenue, with narrow sidewalks, is not an attractive route to encourage pedestrians. The present crosswalks at Stoughton Street and Boston Avenue are scheduled for replacement to make the route to the station more direct, and will require careful design to assure safe passage for pedestrians across Boston Avenue and the access road into the station. Because so much of the pedestrian access from residential neighborhoods is concentrated on the Boston Avenue entrance, wide crosswalks, signals and signing will be essential to help pedestrians reach the station safely.

Pedestrian routes through the Mystic Valley Park, parallel to the parkway, are not shown as connecting to the headhouse, instead they are truncated, requiring use of the sidewalks along the parkway for the final connection to the proposed station. The Mystic Valley Park pedestrian routes should be upgraded to provide good pedestrian access to the station.

Union Square

From a pedestrian point-of-view, the proposed location for the Union Square station is unfortunate because the site is not located centrally to either the residential or commercial areas. (The city may be able to transform the station area in the future.) Pedestrian connections between the existing uses and the station are very indirect, with the site at the edge of the transit loop that may be significantly changed when or if Prospect Street becomes two-way. The proposed sidewalk leading into the square is badly conceived – a wide sidewalk heading toward Union Square, but ending just a few feet from the station. Pedestrians, and local businesses would be better served by a station located much closer to the center of the square.

Few existing streets can be used to connect the new Green Line into the Square. One possibility for improving the connection to Union Square would be to route the new light rail line through the salvage yard area directly to Somerville Avenue north to a terminal station at the southeast corner of Prospect Street and Somerville Avenue. A station in this location would be sited at one end of the commercial center and fully accessible to all merchants and significantly closer to existing residential areas. The station would be highly visible as well – an anchor to the business area and a visible sign of its renewal as a dynamic center of urban life in Somerville.

At a later date, it might be possible to extend the Green Line as a streetcar along Somerville Avenue to reach further into the residential areas of the city and serve more riders. A potential benefit of that extension could be the provision of a loop through the square onto Webster Avenue and back to the alignment of the Union Square line at the location where the loop begins going north toward the square. This should not preclude a future extension of the Green Line toward Porter Square.

Thank you for the opportunity to comment on the DEIR/EA for the Green Line Extension. Please contact us for any clarification or additional comments that you may need.

Sincerely,



Wendy Landman
Executive Director



Robert Sloane
Senior Planner