

Appendix B

Comments on the Expanded Environmental Notification Form and Proponent's Responses

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Index to Comments on the Expanded Environmental Notification Form

Comment Letters

Twenty comment letters were received regarding the Expanded Environmental Notification Form. Each letter has been assigned an identifying alpha-numeric code, as listed below. The letters and the proponent's responses follow.

Name/Affiliation	Identifier
<i>State Elected Officials</i>	
Senator Anthony Petrucci	SE-1
<i>State Agencies</i>	
Executive Office of Energy and Environmental Affairs, Department of Environmental Protection, NE Regional Office	S-1
Massachusetts Water Resources Authority	S-2
Metropolitan Area Planning Council	S-3
<i>Municipalities</i>	
Boston Water and Sewer Commission	M-1
City of Boston Environment Department	M-2
City of Revere, Office of Mayor	M-3
Town of Winthrop, Office of the Town Manager	M-4
<i>Non-Governmental Organizations</i>	
Beacon Hill Civic Association	N-1
Conservation Law Foundation	N-2
Downtown North Association	N-3
Historic New England	N-4
Laborers International	N-5
Partners HealthCare System, Inc.	N-6
Walk Boston	N-7
West End Civic Association	N-8
<i>Other</i>	
Al-Khatib, Malek	O-1
Mertens, Richard B.	O-2
Napier, P.C.	O-3
Nilsson, Edward O. (Nilsson +Siden Associates, Inc.)	O-4



COMMONWEALTH OF MASSACHUSETTS

MASSACHUSETTS SENATE

STATE HOUSE, BOSTON 02133

SENATOR ANTHONY PETRUCELLI
FIRST SUFFOLK AND MIDDLESEX
ROOM 413-B
TEL. (617) 722-1634

November 9, 2007

Secretary Ian A. Bowles
EOEEA, Attn: MEPA Office
Holly S. Johnson, EEA No. 14101
100 Cambridge Street, Suite 900
Boston, MA 02114

RE: Blue Line-Red Line Connection/EENF

Dear Ms. Johnson,

I am submitting my comments in support of the construction of the Blue Line/Red Line Connector and in response to the Expanded Environmental Notification Form. The Commonwealth made a commitment in 1990 to provide a direct connection between the MBTA Blue Line and the Red Line at the Charles/MGH Station. This project deserves to be fully funded, as is ordered under the applicable State Implementation Plan.

SE-1-1

The commitment, as described in the Memorandum of Understanding of 1990, to build the aforementioned direct connection was a smart, forward-looking measure that would encourage the use of public transportation in an effort to mitigate increased automobile use due to the Big Dig. The communities of East Boston, Winthrop, Revere, Chelsea, Saugus and others have anticipated the improved access to the Massachusetts General Hospital; but these expectations have been stymied by the Commonwealth's lack of action. Currently, the residents of these cities are required to walk from the Bowdoin Station, not the simplest of treks for the infirm. However, this walk will soon be lengthened because the MBTA will be using six subway cars instead of four, and the Bowdoin Station is not equipped to manage six cars. Consequently, there will no longer be a stop at the Bowdoin Station, and these same residents, when traveling to MGH, will now be forced to walk all the way from the Government Center Station, which will soon be the last Blue Line stop. This does not encourage public transportation.

SE-1-2

SE-1-1 Thank you for your comment.

SE-1-2 The MBTA is currently operating the Blue Line with six-car trains. Although the Bowdoin Station platform only accommodates four of the six cars, the MBTA will continue to use the Bowdoin Station in this manner for the foreseeable future. Should the project be constructed, a walk from Government Center Station to access MGH, will not be necessary, rather using public transportation will be encouraged.

The Blue Line/Red Line project not only connects the north shore communities with many desirable destinations in Cambridge, but it would also decrease congestion found at the Park Street and Government Center Stations. By decreasing congestion at these Stations, all MBTA passengers would benefit.

Ms. Johnson, I appreciate your review of this letter and encourage you take the necessary steps to fulfill the commitments made long ago.

Sincerely,

ANTHONY PETRUCCELLI
State Senator

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S-1
HJ



COMMONWEALTH OF MASSACHUSETTS
EXECUTIVE OFFICE OF ENERGY & ENVIRONMENTAL AFFAIRS
DEPARTMENT OF ENVIRONMENTAL PROTECTION
NORTHEAST REGIONAL OFFICE

205B Lowell Street, Wilmington, MA 01887 • (978) 694-3200

DEVAL L. PATRICK
Governor

TIMOTHY P. MURRAY
Lieutenant Governor

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NOV 5 2007

IAN A. BOWLES
Secretary

LAURIE BURT
Commissioner

MEPA

November 8, 2007

Ian A. Bowles, Secretary
Executive Office of
Energy & Environmental Affairs
100 Cambridge Street
Boston MA, 02114

RE: Boston
Red Line/Blue Line Connector
Cambridge Street
EEA # 14101

Attn: MEPA Unit

Dear Secretary Bowles:

The Department of Environmental Protection Northeast Regional Office has reviewed the Expanded Environmental Notification Form (EENF) submitted by the Executive Office of Transportation to extend the Blue Line tunnel under Cambridge Street to connect to the Red Line at the Charles/MGH Station (EEA# 14101). The EENF identifies a variety of alternatives that include the realignment of the Blue Line track westbound at Bowdoin Station, which may be closed or reconstructed; a new tunnel under Cambridge Street between Joy Street and Charles Circle; and an underground Blue Line Station, which would connect to the Charles/MGH headhouse. The Red Line/Blue Line connector project is among the air quality mitigation commitments made for the Central Artery/Third Harbor Tunnel project in the State Implementation Plan (SIP), and the SIP revisions include a commitment to complete the final design of this project by the end of 2011. The project is categorically included for the preparation of an environmental impact report (EIR) and EOT is requesting a single EIR review. The Department provides the following comments.

Stormwater

S-1-1

The Department requests that the draft scope in the EENF be expanded to include the proposed stormwater management plan, which the EENF indicates will be in compliance with the Stormwater Management Policy (SMP), and related requirements of the National Pollution Discharge Elimination System (NPDES) General Permit. Drainage for the new tunnel, during construction, and groundwater impacts should be evaluated and explained. The proponent is advised that revisions to the Stormwater Management Policy, and incorporation of the policy into the wetlands and 401 Water Quality Certification regulations will take effect on January 2, 2008. The EIR should demonstrate that source controls, pollution prevention measures, erosion and sediment controls during construction, and the post-development drainage system are consistent with the SMP for water quality and quantity impacts and the NPDES General Permit.

S-1-2

S-1-1 A draft Stormwater Management Plan has been prepared, and is appended to the Alternatives Analysis Technical Report (provided on the Project website, www.mass.gov/massdot/redblue). This preliminary plan will be refined during final design and submitted to DEP for approval. Drainage and groundwater impacts during construction are described in Section 6.9.1.

S-1-2 See Response to S-1-1.

Massachusetts Contingency Plan (MCP)/M.G.L. Chapter 21E

Although the EENF indicates that there are no confirmed active c.21E sites within the proposed route, if any of the proposed tunneling operation occurs in the general vicinity of a gas station or other business where hazardous materials have been used or stored over a period of time, there is a likelihood that localized soil contamination has occurred. The EENF acknowledges that new reviews of c.21E sites will need to be conducted, and any new information on site contamination should be provided in the EIR. As EOT is aware, removing and disposing of contaminated soil, pumping of contaminated groundwater, or working in contaminated media must be done under the provisions of MGL c.21E/21C and OSHA, and necessary permits under these provisions need to be obtained beforehand to avoid delay of the project and/or administrative penalties.

The MassDEP Northeast Regional Office appreciates the opportunity to comment on this proposed project. If you have any general questions regarding these comments, please contact Nancy Baker, MEPA Review Coordinator at (978) 694-3338.

Sincerely,



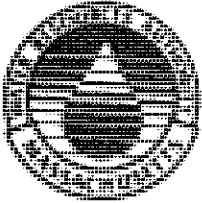
John D. Viola
Deputy Regional Director

cc: Brona Simon, Massachusetts Historical Commission
Iris Davis, Joanne Fagan, MassDEP-NERO

S-1-3

Hazardous materials disposal sites listed on the MCP are described in Section 4.14. A pre-characterization plan, describing methods to identify, manage, and dispose of contaminated soil and groundwater, would be developed as described in Section 6.14.

HJ



MASSACHUSETTS WATER RESOURCES AUTHORITY

Charlestown Navy Yard
100 First Avenue
Boston, Massachusetts 02129

Telephone: (617) 242-6000
Facsimile: (617) 788-4899

November 8, 2007

Mr. Ian A. Bowles, Secretary
Executive Office of Energy and Environmental Affairs
100 Cambridge St, Suite 900
Attn: MEPA Office, Holly Johnson
Boston, MA 02114

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NOV 9 2007

Subject: Environmental Notification Form, # EOEEA 14101
Red Line/Blue Line Connector, Boston

MEPA

Dear Secretary Bowles:

The Massachusetts Water Resources Authority (MWRA) appreciates the opportunity to comment on the Massachusetts Bay Transit Authority's (MBTA) Red Line/Blue Line Connector proposal. The proposed Red Line/Blue Line Connector Project consists of the extension of MBTA's Blue line under Cambridge Street to Charles/MGH Station. The proposed project will begin at the Government Center Station Blue Line Platform and extend to the connection with the new Charles/MGH Station Headhouse. It may also include the construction of a new Bowdoin Station accompanied by additional modifications to the tunnels, new station locations, and the relocation of tracks and support services.

The project limits shown in the Expanded Environmental Notification Form (EENF) indicate proposed construction at the Charles/MGH station is within 200 feet of MWRA's Boston Marginal Conduit (BMC), a 100 year old overflow pipe that follows the bank of the Charles River. At this location, the BMC is a 92-inch by 76-inch brick and mortar conduit that collects combined sewer overflows from the Boston Water and Sewer Commission's (BWSC) combined sewer collection system during large storms. The BMC conveys these overflows, along with some separate stormwater runoff, to MWRA's Prison Point CSO Treatment Facility, where the flows are either pumped into the sewer system tributary to the Deer Island Wastewater Treatment Plant or treated and discharged to the Boston Inner Harbor just below the Charles River Dam. The proposed work limit of the Red Line/Blue Line Connector project is a sufficient distance away from the BMC not to place the conduit at risk of harm during construction. Any change in the work limits that would bring construction closer to the BMC would need to be carefully evaluated by the Proponent and MWRA.

S-2-1

S-2-1

The current limits of work do not anticipate impacting MWRA BMC. MassDOT will coordinate with MWRA if any change in the work limits would bring construction activities closer to the BMC.

S-2-2

The project likely will involve extensive relocation of utilities, including BWSC storm drains and sewers. Storm drains and sewers should be connected to the BWSC collection system and not directly connected to MWRA's BMC. Any plans by the Proponent to relocate or add an overflow connection to the BMC will require approval by MWRA and both a MWRA Direct Connection Permit and an 8(M) Permit for work within MWRA easements. Any questions on the MWRA 8 (m) permit process should continue to be directed to Mr. Kevin McKenna at 617 305-5956.

S-2-3

MWRA is undertaking an \$811 million long-term CSO control plan for Boston Harbor and its tributary rivers. The Proponent should verify that relocation of sewers and storm drains will not increase the frequency or volume of CSO or stormwater discharges into the BMC, in order not to compromise CSO control goals for the Charles River and Boston Inner Harbor. For any new or relocated drains that will carry stormwater only (no sanitary flow), the Proponent should consider the feasibility of conveying stormwater to the Charles River and removing these flows from the sewer system.

I can be reached at 617 788-1165 for further questions and/or assistance in agency coordination.

Sincerely,



Marianne Connolly
Program Manager,
Regulatory Compliance

cc: Kevin McKenna, MWRA Sewer Permitting
David Kubiak, MWRA Engineering & Construction

S-2-2

MassDOT will coordinate with MWRA if final design requires relocation or overflow connection to the BMC, and both a Direct Connection Permit and an 8(M) Permit for work within MWRA easements would be applied for.

S-2-3

At this level of Project design, it is not necessary or feasible to direct stormwater to the Charles River and no impacts to the combined sewer overflow (CSO) system are anticipated. However, if further design indicates that relocation of the CSO system is required, a new storm drain would be installed in accordance with BWSC guidelines. More details on stormwater are provided in Sections 5.10 and 6.10.



Metropolitan Area Planning Council

60 Temple Place, Boston, Massachusetts 02111 617-451-2770 fax 617-482-7185 www.mapc.org

Serving 101 cities and towns in metropolitan Boston

November 8, 2007

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NOV 9 2007

MEPA

Ian A. Bowles, Secretary
Executive Office of Energy and Environmental Affairs
Attention: MEPA Office
Holly Johnson, MEPA# 14101
100 Cambridge Street, Suite 900
Boston, MA 02114

RE: Red Line/Blue Line Connector EENF, MEPA #14101

Dear Secretary Bowles:

The Metropolitan Area Planning Council (MAPC) regularly reviews proposals deemed to have regional impacts. The Council reviews these projects for consistency with *MetroPlan*, the regional policy plan for the Boston metropolitan area, MAPC's *Smart Growth Principles*, and the Commonwealth's *Sustainable Development Principles*, as well as for their impacts upon the environment. MAPC has reviewed the project's Expanded Environmental Notice Form (EENF) and offers the following comments.

The Red Line/Blue Line Connector is an initiative of EOT and a State Implementation Plan (SIP) commitment of the Commonwealth. The project would improve connections and access for residents of East Boston, Revere, and other North Shore communities along with residents of Cambridge, Somerville, and other communities served by the Red Line. The project would also improve access to Massachusetts General Hospital and other nearby medical facilities as well as all other uses in the Cambridge Street corridor.

The project consists of the extension of the MBTA's Blue Line under Cambridge Street to the new Charles/MGH Station. A possible extension of the Blue Line to Lynn and beyond is also under study by EOT and the MBTA, and these two projects in concert would further expand mobility for residents along the North Shore into Boston and to all communities served by the MBTA.

This project is consistent with *MetroPlan* and the preferred scenario which MAPC recently adopted as part our *MetroFuture* planning process. MAPC strongly supports expansion of public transit connections in the project area and the timely completion of this SIP commitment. However, the EENF identifies several issues that will require significant analysis to ensure that the project has the broadest possible benefit while minimizing potentially adverse impacts.

Richard A. Dimino, *President* Gordon Feltman, *Vice President* Grace S. Shepard, *Treasurer* Jay Ash, *Secretary*

Marc D. Dralsen, *Executive Director*

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Full Environmental Impact Review

S-3-1

MAPC does not support the proponent's request for a Single Environmental Impact Report (SEIR). The scale and complexity of the project, interactions with existing and future transit services including the Blue Line Extension, and the expectation of impacts far beyond the Cambridge Street corridor in Boston all argue for both a more interactive process and a wide net of reviewers. We believe a two stage review with a Draft and Final EIR can and should be completed by the April 2010 date proposed for the Single EIR. However, it is possible that the Draft EIR could be designated as the Final EIR if sufficient information is provided that all questions are answered in the DEIR, as provided by 301 CMR 11.08(8).

Alternatives

S-3-2

In addition to the No Action option, two alternatives are proposed in the EENF, the Connector with and without Bowdoin Station. We believe a third option, which includes the Red/Blue Connector with the Blue Line extension to Lynn, should also be evaluated. The Blue Line extension to Lynn is a project actively under development by EOT/MBTA and it has been included in the Regional Transportation Plan with completion expected by 2020 (only 3 years after the assumed completion of this project). The Blue Line Extension with the Connector will likely have significant impacts on ridership and probably on North Shore traffic as well, and those impacts should be evaluated in this MEPA review.

Regional Impacts

S-3-3

This project is expected to improve congested conditions in the central subway area by reducing the need to travel to the Green or Orange Lines to transfer between the Red and Blue Line, and to increase transit ridership along both the Blue Line and Red Line corridors. The impact on transfers at Park, Government Center, Downtown Crossing, and State Street stations should be enumerated, and changes in ridership should be estimated for all stations along the Red and Blue Lines. Traffic impacts should not be limited to

S-3-4

the Cambridge Street corridor. Traffic impacts should also be estimated for any roadways surrounding those stations where ridership is expected to increase by 10% or more.

S-3-5

Impacts on CO2 emissions should be among those impacts evaluated, along with those from the standard air pollutants. Since many of the neighborhoods that will be most

S-3-6

directly impacted have large environmental justice communities as defined by EOEEA's Environmental Justice policy, air quality, land use, and socioeconomic impacts should be enumerated by neighborhood and census tract to ensure that these impacts don't unfairly burden those communities.

S-3-1 The Secretary's Certificate on the EENF took your comment into consideration and scoped accordingly.

S-3-2 The regulatory requirement for completing final design for the Red Line/Blue Line Connector Project by December 31, 2011 is independent of the Blue Line Extension to Lynn project. This Project would complement the Lynn extension project, as described in Section 3.5. Ridership analyses were conducted taking into consideration anticipated changes to the transportation infrastructure, including projects in the Transportation Improvement Plan and long-range regional plans, as described in the Design Year Traffic Impacts Memorandum. This memo is appended to the Alternatives Analysis Technical Report which is provided on the Project website at www.mass.gov/massdot/redblue. MBTA is separately evaluating the Blue Lynn Extension to Lynn Project as part of its Capital Improvement Program (http://www.mbta.com/uploadedfiles/About_the_T/Financials/MBTA%20FY10-FY14%20CIP.pdf).

S-3-3 Ridership data for each Alternative is presented in Sections 3.3.2 and 3.3.3.

S-3-4 Ridership is not expected to increase by more than 10 percent at any station; accordingly, traffic analysis outside of the Cambridge Street corridor was not conducted.

S-3-5 Air quality modeling results are presented in Section 5.6 and show a measurable improvement in greenhouse gas (as represented by CO₂) emissions as compared to the No-Build Alternative.

S-3-6 Environmental Justice neighborhoods, at the US Census tract level, are shown in Figure 4.3-3. Because the Project would not result in permanent adverse impacts to air quality, land use, or socioeconomic indicators, disproportionate impacts to Environmental Justice populations would not occur. Additionally, no displacements of any land use (commercial, institutional, or residential) would occur during the construction period, as described in Section 6.2, there would be no socioeconomic impacts to environmental justice populations.

S-3-7

Finally, while we are not requesting a Special Review Process and a formal Citizens Advisory Committee, we do expect that an advisory committee will be formed for this project. Since impacts are not limited to Boston, project advisory group participation and review of MEPA submissions should include Cambridge, Somerville, Revere, Lynn, and other impacted communities.

Funding

S-3-8

Funding for the project is expected to come from state and local funds, but no specific sources have been identified to date. The EIR should include an estimate of the project cost, and discussion of how these funds are expected to be raised. If existing state sources are expected to provide funding, an accounting of their impact on the funding of other planned projects should be included. If new funding sources are necessary, then estimates of the revenues that will be generated, along with potential sources, should also be made available.

Thank you for the opportunity to comment on this project.

Sincerely,



Marc D. Draisen
Executive Director

cc: Kairos Shen, BRA
Thomas Tinlin, Boston
Susanne Rasmussen, Cambridge
Mr. Phil Ercolini, Somerville
Mayor Thomas G. Ambrosino, Revere
Ms. Pauline Reale, Lynn
Wendy Stern, EOT
Carrie Russell, CLF

S-3-7 The Working Group established for the Project is described in Section 1.5. Members are listed in Section 8.5. MEPA documents are subject to public review; this DEIR is available for review on-line and at the public locations (libraries) listed in Section 8.4.

S-3-8 Cost estimates for the two Build Alternatives, based on the current level of design, are provided in Sections 3.3.2 and 3.3.3. A funding source for constructing the project has not been identified at this time.

HJ

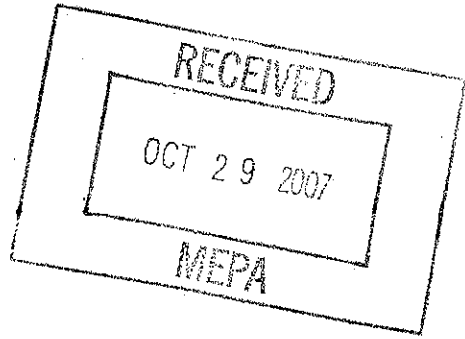
Boston Water and Sewer Commission



980 Harrison Avenue
Boston, MA 02119-2540
617-989-7000

October 25, 2007

Secretary Ian A Bowles
Executive Office of Environmental Affairs
MEPA Office
Attn: Holly S. Johnson, EEA No. 14101
100 Cambridge Street, Suite 900
Boston, MA 02114



Re: Red Line/Blue Line Connector
Expanded Environmental Notification Form

Dear Secretary Bowles:

The Boston Water and Sewer Commission (Commission) has reviewed the Expanded Environmental Notification Form (EENF) for the proposed Red Line/ Blue Line Connector Project in the West End. This letter provides the Commission's comments on the EENF.

The proposed project consists of the extension of the Massachusetts Bay Transportation Authority (MBTA) Blue Line under Cambridge Street from the Government Center Station to the Charles/MGH Station. The major components of the project are:

- The Realignment of the westbound Blue Line track through Bowdoin Station including the widening of the existing tunnel and the closure of the existing Bowdoin Station
- A new 1,400-foot rapid transit tunnel extending the Blue Line under Cambridge Street
- A new underground Blue Line Station connected to the existing Charles/MGH Station
- Possible construction of a new Bowdoin Station

M-1-1

The Commission has several water mains, sanitary sewers and storm drains within the project site. As stated in the EENF, these pipes will need to be supported or relocated during construction. In addition, some pipes will need to be permanently relocated for the tunnel. Please note that for any combined sewer that is impacted by construction, a new storm drain must be installed to accommodate the stormwater runoff from the corresponding tributary area. Special consideration should be given to maintaining the structural integrity of the brick sewers on Cambridge Street. Plans should be developed to replace any water or sewer pipe that is unlikely to withstand the construction of the tunnel. The Executive Office of Transportation (EOT) is responsible for all studies related to the utility replacement.

M-1-2

The EOT should develop plans and coordinate work with the Commission to make sure for adherence with all design standards. All expenses incurred pursuant to the extension, replacement or relocation of a Commission sewer including but not limited to application, engineering, legal, permitting, construction and inspection costs, shall be borne by the EOT.

M-1-1

As described in Section 3.4, all subsurface utilities at open excavation work areas, including water mains, sanitary sewers, and storm drains, would need to be temporarily relocated during Project construction, and replaced to original alignments when work is complete in those areas. Stormwater management systems, as shown in Figures 4.10-1a through b, would be given particular attention as the Project advances to final design. Section 6.10 describes the stormwater management system, based on the current level of design, for the Project, and its relationship to the current system. At this stage of the Project design, no impacts to the combined sewer overflow (CSO) system are anticipated. However, if further design indicates that relocation of the CSO system is required, a new storm drain would be installed in accordance with BWSC guidelines.

M-1-2

During final design, MassDOT will coordinate with BWSC in all matters affecting buried utilities within the jurisdiction of the Commission.



M-1-3

The EENF does not identify any water usage or wastewater generation amounts. However, if any restrooms or irrigation systems are to be included in the project, these estimates will have to be provided. It is the EOT's responsibility to evaluate the capacity of the public water, sewer and storm drainage systems serving the project site to determine if capacity is adequate to meet future project demands.

The Commission has the following comments regarding the proposed project:

M-1-4

1. Prior to demolition of any buildings, all water, sewer and storm drain connections to the buildings must be cut and capped at the main pipe in accordance with the Commission's requirements. The EOT must then complete a Termination Verification Approval Form for a Demolition Permit, available from the Commission, and submit the completed form to the City of Boston's Inspectional Services Department before a demolition permit will be issued.

M-1-5

2. All new or relocated water mains, sewers and storm drains must be designed and constructed at the EOT's expense. They must be designed and constructed in conformance with the Commission's design standards, Water Distribution System and Sewer Use Regulations, and Requirements for Site Plans. To assure compliance with the Commission's requirements, the EOT must submit a site plan and a General Service Application to the Commission's Engineering Customer Service Department for review and approval when the design of the new water and wastewater systems and the proposed service connections to those systems are 50 percent complete. The site plan should include the locations of new, relocated and existing water mains, sewers and drains which serve the site, proposed service connections as well as water meter locations.

M-1-6

3. For any proposed masonry repair and cleaning the EOT will be required to obtain from the Boston Air Pollution Control Commission a permit for Abrasive Blasting or Chemical Cleaning. In accordance with this permit the EOT will be required to provide a detailed description as to how chemical mist and run-off will be contained and either treated before discharge to the sewer or drainage system or collected and disposed of lawfully off site. A copy of the description and any related site plans must be provided to the Commission's Engineering Customer Service Department for review before masonry repair and cleaning commences. The EOT is advised that the Commission may impose additional conditions and requirements before permitting the discharge of the treated wash water to enter the sewer or drainage system.

M-1-7

4. The EOT should be aware that the US Environmental Protection Agency issued a draft Remediation General Permit (RGP) for Groundwater Remediation, Contaminated Construction Dewatering, and Miscellaneous Surface Water Discharges. If groundwater contaminated with petroleum products, for example, is encountered, the EOT will be required to apply for a RGP to cover these discharges.

5. A Groundwater Conservation Overlay District has been developed and apportion of this

M-1-3 One new staff restroom would be constructed in the Blue Line mezzanine level at Charles/MGH Station, with both men's and women's toilets. Water and wastewater demand will be determined in final design. No irrigation systems are planned for the Project.

M-1-4 There would be no building demolition requiring water, sewer, or storm drain capping.

M-1-5 There would be no new utilities needed for either Build Alternative. Existing buried utilities would be temporarily relocated as necessary to accommodate open excavations, as described in Chapter 6. Any construction activity potentially impacting BWSC infrastructure would be coordinated with the Engineering Customer Service Department.

M-1-6 No masonry repair or cleaning is planned for the Project.

M-1-7 As described in Section 6.9, a NPDES Construction General Permit and/or Remediation General Permit, as appropriate, would be obtained before discharging groundwater.



project is located within it. This district is intended to promote the restoration of groundwater levels and reduce the impact of surface water runoff. The application of building permit will be required to construct a structure capable of retaining a specific amount of stormwater accumulated on the site. This retention structure would be designed to direct the stormwater towards the groundwater table for recharge. The EOT should contact the Inspectional Services Department for further information.

M-1-8

M-1-9

6. The EOT is required to obtain a Hydrant Permit for use of any hydrant during the construction phase of this project. The water used from the hydrant must be metered. The EOT should contact the Commission's Operations Division for information on and to obtain a Hydrant Permit.

M-1-10

7. As stated in the EENF, the EOT will design its stormwater management plan in accordance with DEP's Stormwater Management Policy. The Commission requests that The EOT submit a copy of this plan with the site plan for the project. The stormwater management plan must:

- Identify best management practices for controlling erosion and for preventing the discharge of sediment and contaminated groundwater or stormwater runoff to the Commission's drainage system when the construction is underway.
- Include a site map which shows, at a minimum, existing drainage patterns and areas used for storage or treatment of contaminated soils, groundwater or stormwater, and the location of major control or treatment structures to be utilized during the construction.
- Provide a stormwater management plan in compliance with the DEP's standards mentioned above. The plan should include a description of the measures to control pollutants in stormwater after construction is completed.

M-1-11

8. Developers of projects involving disturbances of land of one acre or more will be required to obtain an NPDES General Permit for Construction from the Environmental Protection Agency and the Massachusetts Department of Environmental Protection. The EOT is responsible for determining if such a permit is required and for obtaining the permit. If such a permit is required, it is requested that a copy of the permit and any pollution prevention plan prepared pursuant to the permit be provided to the Commission's Engineering Services Department, prior to the commencement of construction. The pollution prevention plan submitted pursuant to a NPDES Permit may be submitted in place of the pollution prevention plan required by the Commission provided the Plan addresses the same components identified in item 9 above.

M-1-12

9. The EOT must fully investigate methods for retaining stormwater and dewatering drainage on-site or directing them to Charles River before the Commission will consider a request to discharge stormwater to the Commission's system. Under no circumstances will stormwater be allowed to discharge to a sanitary sewer. The feasibility assessment

M-1-8 During final design, MassDOT will coordinate with the Inspectional Services Department in all matters regarding stormwater discharges or groundwater recharge.

M-1-9 During construction, MassDOT will coordinate with the BWSC's Operations Division if hydrant use is required.

M-1-10 As described in Section 6.10, a draft Stormwater Management Plan has been prepared, and is appended to the Alternatives Analysis Technical Report (provided on the Project website, www.mass.gov/massdot/redblue). A Stormwater Pollution Prevention Plan would also be developed, in accordance with NPDES CGP requirements, and submitted for review prior to construction.

M-1-11 As described in Section 6.10, a NPDES CGP will be applied for.

M-1-12 Drainage and groundwater impacts during construction are described in Section 6.9, and stormwater impacts are described in Section 6.10. The Project would not discharge to the Charles River. A draft Stormwater Management Plan has been prepared, and is appended to the Alternatives Analysis Technical Report (provided on the Project website, www.mass.gov/massdot/redblue).



↑ must be submitted with the site plan for the project. The site plan should include a detailed stormwater management plan and analysis of the project's stormwater impact on Charles River.

M-1-13

10. If it is necessary to discharge dewatering drainage to the Commission's storm drainage system, the EOT is advised that a Drainage Discharge Permit from the Commission's Engineering Customer Service Department prior to discharge.

M-1-14

11. The EOT should install permanent castings stating "Don't Dump: Drains to Boston Harbor" next to any catch basin installed or modified as part of this project. The EOT should contact the Commission's Operations Division for information regarding the purchase of the castings.

Thank you for the opportunity to comment on this project.

Yours truly,

John P. Sullivan, P.E.
Chief Engineer

JPS/dsc

C: D. Mohler, EOT
J. Walser, BRA
M. Zlody, BED
P. Laroque, BWSC

M-1-13

During final design, MassDOT will coordinate with the BWSC's Engineering Customer Service Department for a drainage discharge permit.

M-1-14

During final design, MassDOT will coordinate with the BWSC's Operations Division for information regarding the purchase of the castings, and will install the casings where required.

LATE COMMENT

November 13, 2007

Ian A. Bowles, Secretary
Executive Office of Energy and Environmental Affairs
100 Cambridge Street, 9th Floor
Boston, MA 02114
Attention: Holly Johnson, MEPA Office

Re: Red Line/Blue Line Connector - Expanded Environmental Notification Form
EEA #14101

Dear Secretary Bowles:

The City of Boston Environment Department has reviewed the Expanded Environmental Notification Form/Project Notification Form (EENF/PNF) and offers the following comments.

The project, a joint effort of the Massachusetts Executive Office of Transportation (EOT) and the Massachusetts Bay Transportation Authority (MBTA) would extend the MBTA's Blue Line under Cambridge Street to the Charles/MGH Station on the Red Line.

M-2-1 This department's concerns at this time are the effect of construction and operation on the Harrison Gray Otis House and Old West Church/West End Church and the potential for operational noise and vibration on residents. We look forward to studies of these issues, to construction management plans and to the identification of mitigation.

M-2-2 We note that Chapter 616 of the Acts of 1955, as amended, contains a Section 1C (inserted in chapter 622 of the Acts of 1963) which states that the Historic Beacon Hill District includes the area bounded to the north by "a line parallel to and forty feet distant southerly from the southerly sideline of Cambridge street," and bound "westerly and northerly by Embankment road; and northerly by Charles Street circle; and including the estates located at 131 and 141 Cambridge Street and 2-10 Lynde Street."

Thank you for the opportunity to comment. We look forward to the advancement of this project.

Sincerely,

Bryan Glascock
Director

M-2-1

The Project is not anticipated to impact the (First) Harrison Gray Otis House or the Old West Church/West End Church, as described in Section 5.13. No increases in air-borne noise levels at sensitive receptors are expected; modeling results indicate that ground-borne noise, from vibration at the crossover, could impact four multi-family residences that are not historic properties. Special construction techniques for the rails would mitigate these impacts. Construction-period impacts from increases in noise and vibration are described in Sections 6.7 and 6.8, respectively. Proposed mitigation measures include equipment modifications or substitutions, working hour restrictions, and compliance with City ordinances.

M-2-2

The Beacon Hill Historic District is discussed in Section 4.13 of the DEIR. No impacts to the district are anticipated, as described in Section 5.13.



The City of REVERE, MASSACHUSETTS

Office of the Mayor
281 Broadway, Revere, MA 02151
(781) 286-8110 Fax (781) 286-8199

THOMAS G. AMBROSINO
Mayor

October 31, 2007

RECEIVED

NOV 1 2007

MEPA

Secretary Ian A. Bowles
EOEEA, Attention MEPA Office
Holly S. Johnson, EEA No. 14101
100 Cambridge Street, Suite 900
Boston, Massachusetts 02114

Re: *Blue Line/Red Line Connection*

Dear Ms. Johnson:

I am the Mayor of the City of Revere. I am writing in response to the Red Line/Blue Line Connector Expanded Environmental Notification Form and to express my strong support for construction of this important transit improvement.

M-3-1 The connection of the MBTA Blue Line and Red Line Rapid Transit Lines will have a very beneficial impact upon Revere residents as well as all North Shore commuters, who now are deprived of easy access to the Red Line and its abutting medical and educational facilities. Particularly, many Revere and North Shore residents utilize health care services at the Massachusetts General Hospital. The absence of a direct connection between the Blue and Red lines makes travel to that location far more inconvenient than necessary and often discourages the use of public transit. With the connection in place, Revere residents will have improved accessibility to these critical medical services.

M-3-2 It is also important to note that the connection of the MBTA Blue Line to the Red Line has been a longstanding transit commitment and a critical component of the alternative transportation mitigation package for the Big Dig, first memorialized almost 17 years ago in the December 17, 1990 Agreement executed by the former Secretary of Transportation and Construction entitled *Memorandum of Understanding: Traffic and Air Quality Mitigation for the Central Artery/Third Harbor Tunnel*. Residents of the North Shore, and Revere in particular, have been anxiously awaiting the commencement of this promised transportation improvement. These travelers have endured the many inconveniences associated with the Central Artery Project. They have done so on the expectation that the promised mitigation benefit of a direct Blue Line-Red Line connection will be fully honored. A breach of that promise at this 11th hour would not only be a blatant violation of the MOU and other subsequent governmental filings, it would constitute a breach of faith with an important constituency of public transit and further erode the public trust in governmental agencies.

M-3-3 While I recognize that noise and vibration from the construction activities will, for a time, adversely impact the Cambridge Street neighborhood during construction, the long term transit benefits, and the need to honor prior governmental commitments, far outweigh these short term

M-3-1

Thank you for your comment. Table 5.3-1 shows the improvements in access to colleges, universities, and hospitals for residents of Revere, for both environmental justice and non-environmental justice populations.

M-3-2

Thank you for your comment. The Red Line/Blue Line Connector Project final design must be completed by December 31, 2011, in accordance with 310 CMR 7.36.

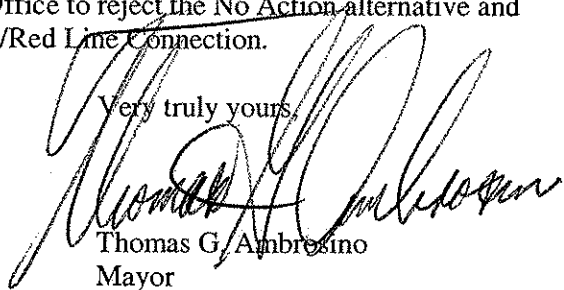
M-3-3

Thank you for your comment. Sections 6.7 and 6.8 describe the increases in noise and vibration levels that would result from the Project during the construction period, and mitigation measures that would be used to minimized those impacts.

Secretary Ian A. Bowles
EOEEA, Attention MEPA Office
Holly S. Johnson, EEA No. 14101
October 31, 2007
Page 2

↑ inconveniences. For these reasons, I urge your Office to reject the No Action alternative and move forward with construction of the Blue Line/Red Line Connection.

Very truly yours,



Thomas G. Ambrosino
Mayor

Cc: The Honorable Revere City Council
Ms. Carrie Schneider Russell, Conservation Law Foundation
Mr. John Vitagliano

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TOWN OF WINTHROP OFFICE OF THE TOWN MANAGER

Town Hall, 1 Metcalf Square, Winthrop, MA 02152 Telephone: 617-846-1077 Fax: 617-846-5458

Richard J. White
Town Manager

October 04, 2007

Secretary Ian A. Bowles
EOEEA, Attn: MEPA Office
Holly S. Johnson EEA No. 14101
100 Cambridge Street, Suite 900
Boston, MA 02114

Dear Secretary Bowles:

M-4-1

I write as Town Manager for the Town of Winthrop commenting on the Massachusetts Executive Office of Transportation & Public Works submission of an Expanded Environmental Notification Form for the Red Line/Blue Line Connector project. The Connector project is of critical importance to Winthrop. The connection of these two lines will be of great benefit to the citizens of our Town. Expanding and making it easier for citizens to use public transportation, while allowing unimpeded transportation from Winthrop to Cambridge and south of Boston is of great benefit to us.

It is my hope that every favorable consideration can be given to this project. Please do not hesitate to contact me at 617-846-1077, if I can be of any assistance to you.

Sincerely,

Richard J. White

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OCT 5 - 2007

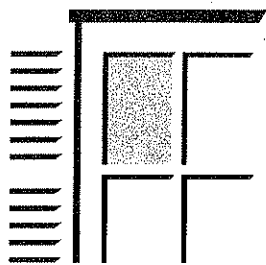
MEPA

M-4

M-4-1

Thank you for your comment.

HJ N-1



**BEACON
HILL**
CIVIC ASSOCIATION

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N-1-1



LATE COMMENT

RECEIVED

NOV 13 2007

MEPA

November 8, 2007

Secretary Ian Bowles
Executive Office of Energy and
Environmental Affairs
Attention: MEPA Office
Holly Johnson
100 Cambridge Street, Suite 900
Boston, MA 02114

Re: Red Line/Blue Line Connector
EOEA No. 14101

Dear Secretary Bowles:

Thank you for the opportunity to comment on the scope of environmental review of the Red Line/Blue Line Connector proposed by the Executive Office of Transportation ("EOT") in its Expanded Environmental Notification Form ("EENF").

The Beacon Hill Civic Association is a membership organization that has sought since 1922 to preserve and enhance the quality of residential life on Beacon Hill. Our neighborhood will be highly impacted by the construction of a subway connector.

In general, we support the construction of a connector because of its positive impact on the regional transportation network. As residents, we would get somewhat improved T service with a connector between the Red Line and the Blue Line. More importantly, patients and employees of Massachusetts General Hospital would get better transit connections and therefore could reduce the number of cars in the city, particularly in our area.

Scope should require evaluation of simpler designs

The EENF proposes evaluation of a four-track tunnel under Cambridge Street which entails maximum cost and maximum disruption during a protracted construction period. The environmental review should compare simpler designs. Simpler designs are less costly and will have lesser adverse

N-1-1

As described in Sections 3.3.2 and 3.3.3, both Build Alternatives would use a single center platform at Charles/MGH Station, two single-track tunnels under Cambridge Street between Blossom Street and Staniford Street, and tail tracks extending west of Charles/MGH Station for train storage. It is not feasible to retain and use the Bowdoin Loop because of grade differences.

↑ environmental impacts. The EOT should be required to evaluate the following three alternatives:

- (1) A two track Blue Line extension with a single platform between the tracks at Charles Circle;
- (2) A design using two single-track tunnels between Joy Street and Charles Circle rather than a single multiple-track tunnel; and
- (3) Adaptation of the Bowdoin Station tracks so that they can be used to store trains for peak demand periods and sidetrack disabled trains.

Alternatives (1) and (2) above should be evaluated separately and in combination.

These alternatives reduce the required width of tunnels and the span of surface road to be carried above the tunnels, and should produce conspicuous benefits. Construction should be faster and less disruptive of surface activities. Costs should be lower. Smaller tunnels provide a greater soil buffer between the tunnels and nearby residences, thereby reducing vibration impacts.

N-1-2

Mitigation of construction

The environmental review should describe in reasonable detail the construction methods and alternative construction methods (namely, cut-and cover and tunneling) along with the mitigation measures proposed to assure reasonable continuous access to residences, businesses and institutions. We will take particular interest in this portion of the environmental review. Ultimate support or opposition of the project by Beacon Hill residents will depend on effective mitigation of access, noise and other adverse impacts of construction.

We expect that EOT is fully committed to restoring the surface of Cambridge Street to its newly improved state.

N-1-3

Coordination with other projects

Traffic in the area of Cambridge Street will be affected in coming years by anticipated major state projects including restoration of the Longfellow Bridge and other bridges crossing the Charles River, and including stabilization and replacement of the Storrow Drive Tunnel at Arlington Street.

N-1-2

Cut-and-cover and tunneling construction methods, as well as sequential excavation mining, are described in Section 3.2. A combination of these methods would be used for either Build Alternative, as described in Sections 3.3.2 and 3.3.3. Construction-period impacts, and proposed mitigation measures, to the range of resources evaluated are described in Chapter 6. Continued pedestrian and vehicle access to businesses, residences, and institutions within the Project area would be maintained throughout the construction period, as described in Section 6.5 and in the Traffic Technical Report, appended to the Alternatives Analysis Technical Report (provided on the Project website, www.mass.gov/massdot/redblue). Landscape and streetscape improvements to Cambridge Street would be restored to pre-construction conditions at the end of the Project.

N-1-3

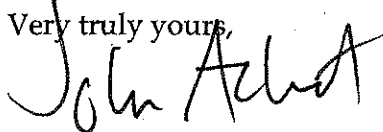
MassDOT and DCR are well aware of the need to synchronize the range of transportation projects scheduled for the next 10 to 20 years. Coordination of the construction period with other transportation projects in the vicinity, as summarized in Section 3.5, is essential to minimize area-wide impacts to traffic flow. Although the Project timeframe has not been established, it is unlikely to occur concurrently with the Longfellow Bridge Restoration Project or the Storrow Drive Tunnel Project.

Secretary Ian Bowles
EOEA 14101
November 8, 2007
Page 3

N-1-4

The environmental review should propose specific measures to assure that the commonwealth coordinates the activities of its various agencies and the relevant city departments in carrying out these necessary projects.

Very truly yours,



John Achatz
Chairman

cc: Sen. Anthony Petrucelli
Rep. Marty Walz
Mayor Tomas Menino
Councilor Mike Ross
Councilor Sal LaMattina

N-1-4

Agency coordination is described in Section 1.5 of the DEIR.



BY EMAIL

Secretary Ian A. Bowles
 EOEEA, Attn: MEPA Office
 Holly S. Johnson, EEA No. 14101
 100 Cambridge Street, Suite 900
 Boston, MA 02114
holly.s.johnson@state.ma.us

RE: Red Line/Blue Line Connector Project EENF

Dear Secretary Bowles:

The Conservation Law Foundation (CLF) is pleased to submit the following comments on the Expanded Environmental Notification Form ("EENF") for the Red Line/ Blue Line Connector Project.

The Red Line/ Blue Line Connector Project is a mitigation commitment from the Central Artery/Tunnel Project and a component of the Commonwealth's Clean Air Act State Implementation Plan. The current obligation for this project is the completion of construction by 2011. The Commonwealth has proposed a modification of that commitment, so that the state will continue to be required to complete design of this project, but not construction. CLF is committed to ensuring that the commitment to design this project is honored, both because this commitment is an important part of the state's obligations to achieve federal air quality goals and because advancement of project design will prepare the state to implement the project and provide a number of important benefits to the region.

The Red Line/ Blue Line Connector is a key transit project that will greatly improve air quality, public health, mobility and economic prosperity in the region. CLF is pleased that the Executive Office of Transportation is taking the necessary steps to complete environmental review and design of this project. The remainder of these comments describes the benefits of the Red Line/ Blue Line Connector Project in greater detail, identifies areas of analysis that we believe should be required under MEPA, and recommends an expedited process for MEPA review.

62 Summer Street, Boston, Massachusetts 02110-1016 • Phone: 617-350-0990 • Fax: 617-350-4030 • www.clf.org

MAINE: 14 Maine Street, Brunswick, Maine 04011-2026 • 207-779-7733 • Fax: 207-779-7373

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VERMONT: 15 East State Street, Suite 4, Montpelier, Vermont 05602-3010 • 802-223-5992 • Fax: 802-223-0060

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Project Benefits

The Red Line/ Blue Line Connector will greatly increase mobility by improving connectivity in the core of the MBTA transit system. The Red Line/ Blue Line Connector will connect the two MBTA rapid transit lines that currently do not intersect. This will result in a shorter, more convenient ride for residents of communities along the Blue Line to destinations along the Red Line and vice versa. The project will eliminate the need for many riders to make two transfers during trips between Red Line and Blue Line destinations. This improvement will both benefit existing riders and attract new riders to the system.

Currently, the MBTA's Blue Line is the only line in the system with significant unused peak hour capacity. The MBTA has invested in lengthened stations and trains on the Blue Line to add new capacity. The Red Line/ Blue Line Connector Project will take advantage of that investment by directly linking the major residential areas along the Blue Line with the jobs, universities and services in the MGH area, in Kendall Square and along the rest of the Red Line.

The Red Line/ Blue Line Connector will also provide relief for the congestion in the core of the MBTA system. Currently, core MBTA stations such as Park Street and Government Center are well above capacity. The Red Line/Blue Line Connector will allow riders to bypass those stations and transfer directly at Charles/MGH station, freeing up space at the intersections of the Green Line and Orange Line with the Red Line and Blue Line. This reduction in station congestion will benefit existing passengers and provide the space needed to accommodate planned increased ridership, especially the increased ridership that will result from the Green Line Extension Project, which will feed directly into these already over-crowded stations.

By improving travel time and convenience for those traveling between Red Line and Blue Line locations and reducing congestion at the core of the system, the Red Line/ Blue Line Connector will result in significant increased ridership, providing a more attractive alternative to driving for many residents. These improvements will therefore contribute to decreased congestion, especially on roadways in the vicinity of the Red Line/ Blue Line Connector and in the Red Line and Blue Line corridors. Increased transit capacity in this area and decreased roadway congestion will be especially important in coming years as the Commonwealth must address deterioration of the Storrow Drive Tunnel and bridges over the Charles River including the Longfellow Bridge. The Red Line/ Blue Line Connector has the potential to provide part of the solution to the mobility and traffic challenges that will likely be presented by these major roadway construction projects in the immediate vicinity.

The Red Line/ Blue Line Connector is an important project to support smart growth goals. Many businesses and communities have already begun investment in the vicinity of the Red Line/ Blue Line Connector in anticipation of the construction of this project. That investment, which is transit-oriented and pedestrian-friendly, should be supported with consistency in transit project planning. In Kendall Square, for example, an

CONSERVATION LAW FOUNDATION

enormous amount of new jobs are being provided by recent and planned development. Similarly, Massachusetts General Hospital, one of the largest employers in the state, has expanded and plans to expand further at their downtown campus. These job centers were built in reliance on planned transit investment. In fact, Massachusetts General Hospital has expanded dramatically with very limited available parking because available and planned transit can provide needed access to customers and employees. The Commonwealth should support creation of job centers in transit-oriented, walkable locations, and advancement of the Red Line/ Blue Line Connector Project is an important opportunity to do so.

Further Analysis Needed

N-2-1

CLF requests that the Executive Office of Transportation be required to revisit ridership data to take account of recent and planned development in the project area. In particular, we believe that ridership will likely need to be adjusted upward to reflect the recent growth along Cambridge Street, in Kendall Square and at Massachusetts General Hospital, as well as planned growth in those areas.

N-2-2

CLF also requests that the Executive Office of Transportation be required to analyze the timing of this project with respect to other major transportation projects planned in the area including Storrow Drive Tunnel Reconstruction and Longfellow Bridge repairs. The Executive Office of Transportation should evaluate the benefits of expediting the Red Line/ Blue Line Connector Project in order to provide improved transit service in this area before roadway capacity is decreased by major roadway construction projects.

N-2-3

Measures to reduce and mitigate construction impacts should be carefully considered for the Red Line/ Blue Line Connector Project. Cambridge Street reconstruction has, unfortunately, been a long process and many residents have had to endure increased noise and other inconveniences. The Executive Office of Transportation should be required to explore all available measures to reduce construction period duration and decrease impacts of construction.

N-2-4

While the Executive Office of Transportation should seek to minimize construction impacts, CLF does believe that these impacts should be kept in perspective when the project is evaluated to determine whether construction should proceed. CLF believes that both the regional and local long-term benefits of this project far outweigh the short term inconveniences that will be caused by construction.

N-2-5

CLF appreciates the attention that was paid to issues of groundwater in the EENF. We believe that potential groundwater issues should be carefully studied for the next phase of environmental review and the Executive Office of Transportation should be required to maintain a commitment to address all groundwater impacts.

N-2-1 The most recent ridership information available is provided in Section 3.3.

N-2-2 The Project has been evaluated for consistency with other transportation projects in the vicinity, as described in Section 3.5. Final design of the Project will be completed by December 31, 2011, in accordance with regulatory requirements. MassDOT has not evaluated an expedited schedule. No construction timeframe has been identified, and a construction funding source has not been identified. MassDOT and DCR are well aware of the need to synchronize the range of transportation projects scheduled for the next 10 to 20 years. The Project would likely not be constructed at the same time as the Longfellow Bridge Restoration Project or the Storrow Drive Tunnel Project.

N-2-3 Construction period impacts are described in Chapter 6, and impacts have been minimized to the extent feasible with the mitigation measures described in Chapter 7.

N-2-4 Thank you for your comment.

N-2-5 The existing groundwater conditions are described in Section 4.10. Permanent impacts are described in Section 5.10, and temporary (construction period) impacts in Section 6.10. Full analyses are provided in the Groundwater Management Plan, appended to the Alternatives Analysis Technical Report (provided on the Project website, www.mass.gov/massdot/redblue).

CONSERVATION LAW FOUNDATION

Request for Expedited Process

N-2-6

Overall, CLF believes that this project will provide enormous benefits and that the challenges in designing the project and mitigating impacts are relatively small. CLF believes that an expedited environmental review process is appropriate and strongly supports implementation of the Red Line/ Blue Line Connector Project. CLF supports the Executive Office of Transportation's request to complete a Single Environmental Impact Report for the Red Line/ Blue Line Connector Project provided that the Executive Office of Energy and Environmental Affairs requires the Executive Office of Transportation to include the following in the Single Environmental Impact Report: (1) updated ridership numbers based on recent and planned development in the project corridor; (2) analysis of early project construction to address mobility challenges posed by major roadway projects in the project area and a coordinated approach to all transportation projects in the project area (3) a list of planned measures to minimize and mitigate construction impacts (4) a list of planned measures to fully address any potential groundwater impacts.

Conclusion

N-2-7

CLF strongly supports the Red Line/ Blue Line Connector Project and is pleased with the Executive Office of Transportation's recent efforts to advance the design of this project. We support a Single Environmental Impact Report for the project, provided that the areas where further analysis is needed, as identified by CLF and others, are addressed in that document.

If a project advisory committee is formed for the Red Line/ Blue Line Connector, CLF would welcome the opportunity to serve on that committee.

Thank you for the opportunity to comment.

Sincerely,



Carrie Russell
Staff Attorney

N-2-6

This DEIR assesses the impact to ridership, coordination with other transportation projects, mitigation measures, and measures to address groundwater impacts in Sections 3.3, 3.5, 7.3, and 6.10 respectively, in a thorough and comprehensive manner.

N-2-7

Thank you for your comment. The Certificate requires preparation of Draft and Final Environmental Impact Reports.

downtown north association

N-3

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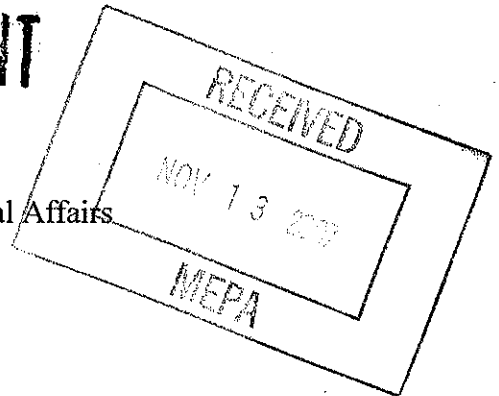
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MALEK AL-KHATIB
West End Civic Association

LATE COMMENT

November 8, 2007

Ian A. Bowles, Secretary
Executive Office of Energy and Environmental Affairs
Commonwealth of Massachusetts
100 Cambridge Street
Boston, MA 02114



RE: ENF Form 14101 -- The Proposed Red Line/Blue Line Connector

ATT: MEPA Office

Dear Secretary Bowles,

Please be advised that the Downtown North Association fully supports the goals and purposes of the longstanding proposal to connect the Red Line and Blue Lines; and to that end, we very much support and hope to participate in the further environmental review of this project, which has now finally been commenced by the Environmental Notification Form that is the subject of this correspondence.

As more fully described in the attachment hereto, the Downtown North Association represents and serves the Downtown North/West End community that will be among the most directly and permanently affected by both the construction and the operation of this project. Our community currently accommodates the MBTA Purple, Orange, Green, Red and Blue Lines; and the proposed connection between the Red and Blue Lines in particular will be made under Cambridge Street, which our neighborhood shares with Beacon Hill as an important perimeter roadway.

We are, therefore, particularly sensitive to both the costs and the benefits of this important project; and that community assessment is made:

- ◆ In the wake of well over a decade of major constriction involving the largely completed MTA/CAT and MBTA North Station Improvement Projects, as well as the recently completed new Charles River T Station and the adjacent new Liberty Hotel on the former site of the Charles Street Jail.
- ◆ In the midst of the continuing and nearly completed reconstruction of Cambridge Street and the creation new shoreline parks in the New Charles River Basin.

PRESIDENT

RICHARD BERTMAN
tel: 617-262-4354
email: bertman@cbtarchitects.com

DOWNTOWN NORTH ASSOCIATION

c/o CBT Architects
110 Canal Street, Boston, MA 02114

EXECUTIVE DIRECTOR

ROBERT B. O'BRIEN
tel: 617-461-6730
email: rbobrien@nisa.com

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- ◆ In the midst of the continuing and nearly completed reconstruction of Cambridge Street and the creation new shoreline parks in the New Charles River Basin.
- ◆ In anticipation of the required reconstruction of the Longfellow Bridge and major elements of Storrow Drive, as well as the planned extension of the Green Line to Medford and Somerville.
- ◆ In the context of unprecedented levels of new economic development throughout the Downtown North/West End community, as well as in surrounding areas in Boston and Cambridge. This includes, but is not limited to, major new construction on the growing campus of MGH, which is among our most valued community and regional medical institutions, not to mention our largest employer and health care provider.

It is clear that the proposed connection of the Red Line and Blue Line will have substantial benefits for the regional as a whole by providing increased mobility, accessibility, connectivity and capacity, as well as improved air quality and reduced congestion throughout the extensive service areas of the existing Red and Blue Lines. We are confident that these critical regional benefits, which have been outlined in the ENF and elsewhere, will be well and fully documented in the expected EIR process and probably require no further comment herein.

But we would note for your consideration in the EIR process some more local issues and opportunities that we recommend and request also be addressed in the EIR process. These include:

N-3-1

- ◆ The need to coordinate the planning, design and construction of this project with the planned reconstruction of Longfellow Bridge and Storrow Drive, as well as the evolving form and function of Charles Circle. On the issues side, we must assure that all of these projects are scheduled and sequenced in order to preserve and protect transit, vehicular and pedestrian circulation and capacity throughout the course of all of these projects, each of which will affect all of these transportation modalities and the related quality of community life. On the opportunity side, we need to explore the possibility of coordinating the planning, design and construction of these related projects so that their potential synergies are identified and enhanced and their combined schedules and adverse impacts are thereby minimized.

N-3-2

- ◆ The goal of minimizing the adverse impacts of project construction on the long awaited and only recently reconstructed Cambridge Street.

N-3-1

MassDOT and DCR are well aware of the need to synchronize the range of transportation projects scheduled for the next 10 to 20 years. Coordination of the construction period with other transportation projects in the vicinity, as summarized in Section 3.5, is essential to minimize area-wide impacts to traffic flow. Project-specific detour routes are shown in Figure 6.5-1, based on the current level of design. These preliminary detour routes may be refined as the Project progresses to final design, and further revision may occur as the Project construction is coordinated with other transportation projects. No construction timeframe has been identified, and a construction funding source has not been identified.

N-3-2

Sections 3.3.2 and 3.3.3 describe the proposed construction method, revised from that presented in the EENF. In particular, the majority of the alignment under Cambridge Street would be bored by a mined tunneling machine, with no disturbance to Cambridge Street. Where open excavations are required, at the eastern and western extents of the Project, four traffic lanes would be maintained during the regular work week, with lane restrictions only at night and on weekends. Detours, as shown in Figure 6.5-1, would route through-traffic around the Project area (and avoid adjacent neighborhoods). Any disturbance to the landscape or streetscape along Cambridge Street would be restored at the end of the construction period.

N-3-3

- ◆ Reconsideration of the proposed closing of the Bowdoin T Station on Cambridge Street as part of the reconfiguration and reconstruction of the Government Center T Station. In the context of the proposed Red/Blue Lines Connector, Bowdoin Station may well play an important new role that would not otherwise be apparent or required without the Red/Blue Lines Connector.

N-3-4

- ◆ Consideration of the utilization of new people-mover technologies, which might be employed either to supplement or possibly to replace the proposed heavy rail connection between Bowdoin and Charles Stations. Such a system might also be well incorporated into the expanding pedestrian circulation network to and through the adjacent Massachusetts General Hospital; to which inter-connected Red and Blue Lines would provide exceptional safe and convenient access for patients, visitors and employees alike.

N-3-5

- ◆ The possibility of more efficient and expeditious planning design policies and procedures, including consideration of design/build strategies that could be more efficient, expeditious than more traditional public construction strategies.

We are confident that attention to these matters will do nothing but enhance an otherwise most worthy and timely project. It is to that end, that we hereby endorse the present ENF and look forward to working with other interested parties from within and without the Downtown North West End community to participate in and otherwise support the EIR process that we hope and expect will follow quickly.

Sincerely,



Robert B. O'Brien
Executive Director

N-3-3

The alternatives considered in the DEIR are described in Section 3.3. Alternative 2, Relocation of Bowdoin Station, would allow continued access to the Blue Line at this location. This Alternative would be at the slight expense of increased travel times from the new Blue Line platform at Charles/MGH Station to Government Center Station, as compared to Alternative 1, Elimination of Bowdoin Station.

N-3-4

The suggested alternative would not meet the regulatory requirement of 310 CMR 7.36, and was not considered in the DEIR, as explained in Section 3.2.1.

N-3-5

The Project is governed by 310 CMR 7.36; that regulation requires that the final design for the Red Line/Blue Line Connector Project be completed by December 31, 2011. MassDOT has not determined if this Project would be design/build.

DOWNTOWN NORTH ASSOCIATION & COMMUNITY

Downtown North Association (DNA) is a not-for-profit coalition, which represents the business, institutional, professional, recreational and residential interests in the mixed-use community that is bounded by City Hall Plaza on the south, Charles River on the north, Beacon Hill on the west and the North End on the east and that was historically known as the West End. The purpose of the Association is to encourage and contribute to the continued economic, social and physical revitalization and redevelopment of the Downtown North/West End community as a whole. The strategies employed to accomplish that mission include collaborative planning and proactive advocacy regarding the full range of issues and opportunities that challenge and confront our neighborhood, emphasizing communication, coordination and cooperation with the public agencies and private interests that will influence and facilitate a more cohesive and successful community.

The more than one hundred member organizations of the Downtown North Association represent a broad cross-section of the commercial, institutional, professional, recreational and residential interests in the Downtown North/West End community, which encompasses a variety of major sub-districts including:

- ❖ The West End residential neighborhood, including Charles River Park, West End Place, the Hawthorne Place and Whittier Place Condominiums, as well the new Charles River Plaza retail and office complex, Holiday Inn Select, a major professional building on Staniford Street, the West End Library, Old West Church and the Harrison Gray Otis House.*
- ❖ The Bulfinch Triangle, immediately south of Causeway Street, which is home to most of the retail, bar, restaurant and hotel establishments and professional firms in the area and contains more than five acres of redevelopment parcels to be made available with the demolition of the CAT and Green Line elevated structures. .*
- ❖ The North Station Economic Development Area, immediately north of Causeway Street, which includes North Station itself, TD Banknorth Garden, the Tip O'Neill Federal Building, the Causeway/Strada 234 and Lovejoy Wharf buildings, and the southern portal of the Zakim/Bunker Hill Bridge, as well as the major redevelopment parcels on the site of the old Boston Garden.*
- ❖ The adjacent Nashua Street Quadrant, which includes Spaulding Rehabilitation Hospital, the new Nashua Street Residences Project and the new Nashua Meadows Park, as well as a number of important new development parcels.*
- ❖ The medical sector, in the Cambridge Street/Charles Street area, which includes Massachusetts General Hospital, Massachusetts Eye & Ear Infirmary, Shiners Burns Hospital for Children and the Scheppens Eye Research Institute, as well as the new Liberty Hotel & Conference Center in the former Charles Street Jail.*
- ❖ The northern portion of Government Center, which includes the new Edward Brooke Suffolk County Courthouse, the Lindemann Center and Hurley State Office Building, Government Center Garage, the Area A-1 Police Station, the New Chardon Street Post Office, Channel 7, One Bowdoin Place and One Bulfinch Place.*

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HISTORIC NEW ENGLAND

Defining the past. Shaping the future.

N-4

HJ

141 Cambridge Street
Boston, MA 02114-2702
tel 617.227.3956
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www.HistoricNewEngland.org

RECEIVED

NOV 7 2007

MEPA

November 7, 2007

Secretary Ian A. Bowles
EOEEA, Attn: MEPA Office
Holly S. Johnson, EEA No. 14101
100 Cambridge Street, Suite 900
Boston, MA 02114

Re: Red Line/Blue Line Connector Project

Dear Secretary Bowles:

I write as President and CEO of Historic New England, the oldest and largest regional preservation organization in the nation and owner of nine important Massachusetts historic sites, including the first Harrison Gray Otis House (1796) located at 141 Cambridge Street in Boston. On behalf of our 6,000 members, I must express serious concern about the proposed Red Line/Blue Line Connector Project as described in the Expanded Environmental Notification Form (EENF).

The Otis House, a National Historic Landmark, functions as a historic house museum as well as Historic New England's organizational headquarters. Additionally, the building houses our Library and Archives facility, responsible for over 1 million priceless historic photographs, architectural drawings, manuscripts and printed material. Next door to the Otis House is the Old West Church (1806), also a National Historic Landmark, and one of 75 historic properties on which Historic New England holds preservation restrictions. Both of these historic treasures lie immediately adjacent to the proposed connector project, as described in the Historical and Archaeological Resources Section of the EENF. As stated in the EENF, "The proposed project will result in some noise and vibration impacts, both during and after construction." The potential disruption to public visits and educational programs due to noise during the proposed Red Line/Blue Line Connector project far outweighs the ongoing disruption experienced during the current Cambridge Street beautification project. Of even greater concern, is the serious potential for damage to the historic buildings and our collections due to vibrations, during construction and also from passing trains after project completion.

N-4-1

N-4-2

Otis House and Old West stand not just as tributes to architectural heritage and the turn of the 19th century, they also represent two of the last surviving structures of the former West End neighborhood and tell the 20th-century story of Urban Renewal in Boston. Further, the Otis House, acquired by our founder William Sumner Appleton in 1916, plays a key role in illustrating the 20th-century preservation movement in the New

N-4-1

Ambient noise levels along Cambridge Street are relatively high due to high traffic volume along and emergency vehicle use of the corridor. Permanent increases in noise levels at these two sites are not expected from operation of the extended Blue Line, as described in Section 5.7. The subsurface train would not generate noise that would propagate into the surrounding community. Unmitigated noise levels during construction would be increased over ambient conditions. Section 6.7 discusses mitigation measures that would be used to minimize these temporary increases in noise levels. Similarly, vibration levels are not expected to increase due to the subsurface operations when mitigation measures (special frogs at track joints) are installed. As described in Sections 5.8 and 6.8, vibration damage to buildings is not expected from the Project.

N-4-2

Sections 5.13 and 6.13 describe the potential permanent and construction period impacts, respectively, to historic and archaeological resources within the Project area. Neither the Otis House nor the Old West Church are expected to be impacted. In any case, building settlement in areas where groundwater dewatering would be implemented, such as in the area surrounding Bowdoin Station, would be monitored. As described in Section 6.9, if settlement is detected, groundwater dewatering would be stopped, and appropriate measures (such as building underpinning) would be taken.

NOLD TO BOWLES

Red Line/Blue Line Connector, Boston, MA

November 7, 2007

Page Two of Two

↑ England region and beyond. It is imperative that all measures be taken to protect and prevent damage to both of these historic landmarks.


N-4-3

I cannot stress enough the importance of consultation with the Massachusetts Historical Commission (MHC). MHC review of the project is critical to identifying threats and seeking ways to mitigate or avoid actions that will harm or destroy all potentially affected historic resources. The preservation of Otis House and Old West and the integrity of the surrounding Beacon Hill Historic District are too important to be dismissed. The transportation needs of greater Boston and historic preservation goals are not mutually exclusive. There are creative and effective ways to ensure that historic buildings are not damaged during the course of major transportation projects, but these methods must be carefully considered in discussion between transportation officials and qualified preservation representatives. It is the role of the MHC to ensure that this happens.

N-4-4

Lastly, I want to express my extreme displeasure that Historic New England was omitted from the EENF distribution list, despite the fact that the Otis House is listed in the EENF as being one of the most potentially impacted historic resources. The lack of attention to detail as evidenced by this omission as well as the incomplete descriptions of the Otis House and Old West are not acceptable for a major transportation planning initiative nor for the protection of nationally significant historic properties. Thank you.

Sincerely,



Carl R. Nold, President and CEO
Historic New England

cc: Brona Simon, Executive Director, Massachusetts Historical Commission

N-4-3

Coordination with MHC is ongoing. The MHC database was used to identify historic districts or properties within the Project area, as shown in Table 4.13-2. As described in Sections 5.13 and 6.13, a field monitoring plan will be developed to guide construction activities in the event that archaeological resources are identified; the plan would be developed in accordance with MHC requirements.

N-4-4

Historic New England has been added to the distribution list as a Working Group Member, as shown in Section 8.5. These two historic properties are identified in Section 4.13 and described in full in the Historic and Archaeological Resources Technical Report appended to the Alternatives Analysis Technical Report (provided in the Project website, www.mass.gov/massdot/redblue).



LABORERS' INTERNATIONAL UNION of NORTH AMERICA
COMPRESSED AIR & FREE AIR SHAFTS, TUNNELS, FOUNDATIONS, CAISSONS
TEST - BORING, SUBWAY, SEWER COFFERDAM CONSTRUCTION
WORKERS UNION of GREATER BOSTON and VICINITY

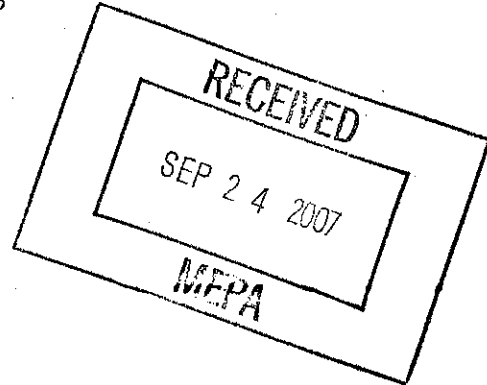


AFL - CIO

AFL - CIO

LOCAL UNION No.88
170 WASHINGTON STREET, QUINCY, MASSACHUSETTS 02169
Telephone (617) 479-1088
Fax (617) 479-8463

September 20, 2007



Re: Red Line/ Blue Line Connector
Public Notice

Secretary of Environment Affair

Hi my name is Ken MacLean I am the business manager for Local 88 Tunnel worker. I am writing you about the article in the Boston Herald September 19,2007 400 legal notice Environment Review. I would be interested in any information you have on the RED LINE AND BLUE LINE CONNECTOR and a site visit and consultation session on this project. As well as any information about MBTA work that is involving a tunnel or shaft and any information you may have on the extension of the Green Line and the North/ South rail link. I can be reached at Local 88 Tunnel Worker 170 Washington Street Quincy Mass 02169 Phone number 617-479-1088 ex 3 my Email address is kenmaclean222@yahoo.com.

N-5-1

Thank you,

Ken MacLean
Business Manager L-88

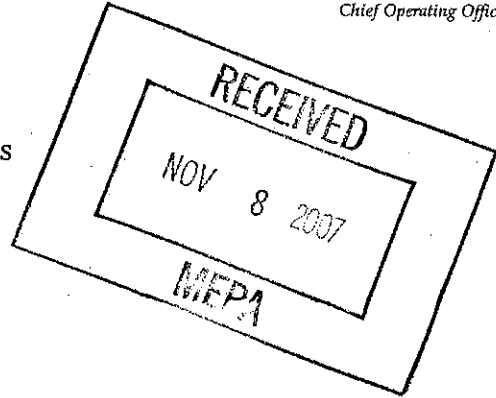
N-5-1 Laborers' International Union of North America has been added to the distribution list, as noted in Section 8.6.

Thomas P. Glynn, Ph.D.
Chief Operating Officer

November 7, 2007

An integrated
health care system
founded by
Brigham and
Women's Hospital
and
Massachusetts
General Hospital

Secretary Ian A. Bowles
Executive Office of Energy and Environmental Affairs
Attn: MEPA Office
Holly Johnson, EOEA No. 14101
100 Cambridge Street, Suite 900
Boston MA 02114



Dear Secretary Bowles,

I write on behalf of Partners HealthCare System, Inc. and its affiliate, the Massachusetts General Hospital (collectively, "Partners") to comment on the Expanded Environmental Notification Form ("EENF") submitted by the Executive Office of Transportation ("EOT") for the Red Line/Blue Line Connector. As you know, Partners is a strong supporter of this critical transit project and submits the following comments in order to inform the preparation of a Scope for the environmental review of this project. It is our hope that a thorough Scope will ensure that all outstanding issues are aired and resolved through the MEPA process, allowing construction of the Connector to proceed expeditiously once environmental review and design and engineering are complete.

N-6-1

1. The Scope Should Require Evaluation of Several Alternative Configurations for the Project

EOT proposes to evaluate two alternatives in addition to the No Build alternative: a Blue Line extension with the elimination of Bowdoin Station and a Blue Line extension with a relocated Bowdoin Station. Partners believes, however, that a third alternative is possible and should be explored in the EIR: improving the track curvature so that the flexibility is retained to allow occasional use of Bowdoin Station.

N-6-2

In addition, there are alternative track and platform configurations that should be explored in the EIR. The EENF fails to justify a configuration requiring four tracks—a configuration which poses substantial challenges and entails substantial impacts during construction. The Scope for the EIR should require EOT to compare this four-track configuration to a configuration utilizing only two tracks with a center-loading platform at Charles Street. Such a configuration should reduce the severity of excavation under Charles Street.

N-6-1

As described in Section 3.3.3, DEIR Alternative 2, Relocate Bowdoin Station, includes track realignment as well as platform relocation, to allow for full use of Bowdoin Station.

N-6-2

As described in Sections 3.3.2 and 3.3.3, both Build Alternatives would use only two tracks throughout the alignment. The four-track alternatives were dismissed from further review during the alternatives analysis described in Section 3.2.

N-6-3

Finally, the Scope should require evaluation of a configuration in which the extension of the Blue Line is accommodated in two separate, and narrower, tunnels, each of which would accommodate one track in each direction. Again, the purpose of requiring consideration of this alternative configuration is to see if less construction period disruption could be achieved.

N-6-4

Partners does not, however, believe that the Scope should require EOT to evaluate an alternative in which a pedestrian-only connection is considered in lieu of a transit connection between the Blue Line and Red Line, as some commenters have suggested. MEPA regulations require that alternatives to the Project be considered “in light of the objectives of the Proponent and the mission of any Participating Agency, including relevant statutes, regulations, executive orders and other policy directives, and any applicable Federal, municipal, or regional plan formally adopted by an Agency or any Federal, municipal, or regional governmental entity.” 301 CMR 11.07(6)(f)(3). Both the Department of Environmental Protection’s Transit System Improvement regulations and the Federally-approved State Implementation Plan define the Red Line/Blue Line Connector as a *transit* project that connects the Blue Line rapid transit service at Government Center to the Red Line rapid transit service at Charles Station. The concept of using an at-grade or below-grade pedestrian connection has been evaluated and rejected in the past and state and Federal policy and plans have now adopted the requirement to plan and design a transit connection. The MEPA Scope should not require consideration of an alternative which fails to meet the Project objectives as defined by relevant state and Federal regulations and plans.

2. The Scope Should Require That All of the Environmental Benefits of the Red-Blue Connector Project Be Included in the EIR

MEPA requires that environmental review documents consider all of the environmental impacts of a proposed Project—both the negative impacts and the positive impacts. 301 CMR 11.07(h). Partners is confident that the EIR will demonstrate that the environmental impacts of this project, once completed, are strongly positive. In fact, the failure to have the Connector completed and opened it to service by 2000 (as required in the Big Dig preconstruction Vent Shaft Permits of 1991) is having adverse environmental impacts. The completion of the Big Dig has put more traffic pressure on the already congested Route 1A in East Boston and Revere, causing additional air pollution, which the Blue-Red Connector is intended to reduce by increasing the convenience of using public transportation.

N-6-5

The Expanded Environmental Notification Form acknowledges in general terms that the Connector will reduce regional automobile trips, improve the efficiency of the rapid transit system and improve air quality. But the EENF does not present an up-to-date, accurate, quantitative picture of these benefits. For example, the EENF simply acknowledges that ridership estimates range between 3,800 and 9,000 weekday riders and then settles on an estimate of 3,100 new daily transit trips, a figure below the lower end of this range. Similarly, the EENF states that air quality modeling as been done

N-6-3 See response to comment N-6-2.

N-6-4 As noted, the pedestrian-only alternative does not meet regulatory requirements for extension of the Blue Line and was not evaluated.

N-6-5 Both Build Alternatives would result in measurable improvements in air quality, as documented in Section 5.6. A description of the modeling is provided in the Air Quality Technical Report, appended to the Alternatives Analysis Technical Report (provided on the Project website, www.mass.gov/massdot/redblue).



which consistently demonstrates air quality benefits, but the results of this modeling are not presented.

As you know, in the various proceedings surrounding the SIP commitments, Partners has provided technical analysis by Cambridge Systematics which demonstrates that, if engineered and constructed as originally promised in the 1991 SIP Commitments, the Red-Blue Connector will provide substantial air quality and transportation benefits, particularly, but not only, in the core areas of Revere, East Boston, Boston proper and Cambridge. Residents of communities along the entire Blue and Red Line service areas would use the Red-Blue Connector for direct service to the Massachusetts General Hospital and to the other, major medical facilities in the Charles/MGH area, as well as to reach the universities and employment centers under development along these lines.

N-6-6

Partners believes that it is critical for the SEIR to comprehensively and fairly present the environmental benefits of the Connector because our ultimate goal is not just to study, design and engineer the Red-Blue Connector but to ensure that it is constructed and operated. Current Commonwealth and Federal transportation policy prioritizes potential transportation investments based on cost-effectiveness: how much would be spent to achieve benefits including ridership and air quality improvements. If the EIR does not include up-to-date estimates of these environmental and transportation benefits, the Executive Office of Transportation will not be able to apply its own project selection criteria to decide whether the Connector should be built.

N-6-7

Partners therefore urges you to ensure that the Scope requires a complete, up-to-date accounting of the Connector's potential environmental benefits. The EIR should recalculate the potential ridership increases on both the Red and Blue Lines, using assumptions that are consistent with the Boston Redevelopment Authority's approved Institutional Master Plan for Massachusetts General Hospital and the most recent land use and demographic assumptions developed by the Metropolitan Area Planning Council for adoption by the Boston Metropolitan Planning Organization.

N-6-8

The EIR should also address the benefits to the rapid transit system as a whole—not just the Red Line and Blue Line—because the Connector will serve as an essential link for all transit riders passing through the heart of the MBTA system in the downtown where the major line-haul transit services intersect. As you know, the Red and Blue Lines remain the only two transit lines in the Boston transit network that do not directly intersect. The lack of a direct link forces double transfers on passengers and extra loading on two of the most overloaded links in the T network: the Green Line from Government Center to Park Street and the Red Line from Charles Street to Park Street, causing overcrowding for passengers on the Red and Green Lines, as well as to Blue Line riders whose trips go beyond Government Center. The lengthening of stations on the Blue Line to permit 6-car trains, rather than 4-car, and the new equipment to support this, means that the Blue Line is about to have 50% more capacity, the only one of the rapid transit lines with extra capacity. The Connector will help to use this capacity productively and allow the rapid transit system to accommodate the new riders that regional policy would say should be attracted to the MBTA from places such as Somerville and Medford (with the

N-6-6 A comparison of the two Build Alternatives including a summary of the benefits of each, is provided in Section 3.3.4 of the DEIR.

N-6-7 All Project impacts, both beneficial and adverse, are described in Chapter 5 for permanent effects and in Chapter 6 for temporary (construction period) effects. The most recent ridership data are presented in Sections 3.3.2 and 3.3.3 for the two Build Alternatives. These data and the projected boardings presented in Tables 3-2 and 3-3, are based on MBTA statistics and CTPS analyses for each Build Alternative, compared to the No-Build Alternative.

N-6-8 Transfers between the subway lines would be reduced, and ridership increased, for either Build Alternative. Reducing transfers would relieve congestion at other stations in Downtown Boston, and the increased connectivity of the system would accommodate the increased ridership, benefitting the system as a whole.

Green Line extension) as well as East Boston, Revere, and eventually Lynn (which are served by the Red Line and Blue Line).

N-6-9

Consistent with EEA's Environmental Justice Policy, the EIR should also document the extent to which the potential environmental benefits of the Red-Blue Connector would accrue to long neglected, environmental justice communities along the Red and Blue Lines. Among other benefits, the Connector will afford access to the planned expansion of employment in the MGH and Kendall-MIT-East Cambridge areas for workers living in East Boston, Revere and Lynn.

3. The Scope Should Require Preparation of a Detailed Construction Period Mitigation Plan Addressing Not Only the Construction of the Red-Blue Connector But the Simultaneous Construction of Other Planned Transportation Projects Affecting the Area

N-6-10

The primary negative environmental impacts of the Connector project are those that occur during the construction period. Partners and Massachusetts General Hospital share many of the concerns of our neighbors with respect to construction impacts. The EIR must provide detailed information on how EOT plans to provide access to the Beacon Hill and West End communities, as well as access to MGH for ambulances, patients, employees and visitors, during construction of the Connector. The mitigation plan should include special provisions designed to maintain timely ambulance access to Massachusetts General Hospital throughout the construction process. Partners specifically requests that the Scope require EOT to evaluate the mitigation option of providing access from Blossom Street to Storrow Drive, at least to and from the eastbound direction, and possibly to the westbound, in order to mitigate the loss of capacity on Cambridge Street during project construction. The Scope should also require EOT to evaluate the extent to which impacts can be mitigated by expediting construction of the Connector, thereby reducing the length of time that construction impacts occur.

N-6-11

Partners also urges MEPA to encourage EOT to consider a non-traditional approach to securing the design and engineering expertise needed for the Connector. EOT's goal should be to minimize disruption during construction. The best way to accomplish this goal may be to have the engineering consultant complete 100% construction designs. Alternately, the best approach may involve proceeding only to a 10-20% level of design and then manage a competition to pick a design-build firm and oversee their implementation. EOT should manage its procurement of consulting services in a way which ensures that the consultant has the flexibility to follow either of these paths. By choosing the EIR engineer and consultant team with capacity to go to 100% design or switch to design-build plus oversight, the public can gain the benefit of the creativity of multiple designers trying to minimize construction disruption.

N-6-12

One of the most critical issues to be addressed in the Scope is ensuring that the construction period impacts and mitigation plans take into consideration not only the

N-6-9 The Project is intended, in part, to improve access for residents in outlying areas along the Blue Line to destinations along the Red Line. The analysis presented in Section 5.3, Environmental Justice, for example, shows the benefits for residents in Revere in improved access to jobs, services, and educational opportunities that would result from either Build Alternative. These benefits would accrue to both environmental justice and non-environmental justice populations.

N-6-10 The proposed construction method has been changed from that described in the EENF: cut-and-cover construction would only be used for short segments and through-traffic maintained to the extent feasible. Construction period impacts to existing transportation systems and traffic flow are described in Sections 6.4 and 6.5, respectively. Traffic detour routes are shown in Figure 6.7-1. Local access to MGH facilities for emergency vehicles would be maintained throughout the construction period. Mitigation measures, as needed, are described in Chapter 7. MassDOT and DCR are well aware of the need to synchronize the range of transportation projects scheduled for the next 10 to 20 years. Coordination of the construction period with other transportation projects in the vicinity, as summarized in Section 3.5, is essential to minimize area-wide impacts to traffic flow.

N-6-11 The consulting team is comprised of firms especially selected for their expertise in the range of issues to be addressed for both the engineering design of the Project and the assessment of environmental impacts. This approach responds to both the regulatory requirement for completing final design by December 31, 2011 and conducting the MEPA evaluation reflected in this DEIR. MassDOT has not determined if this Project would be constructed as design/build. Finally, the Build Alternatives, as described in Sections 3.3.2 and 3.3.3, would use an underground tunnel boring machine for much of the alignment under Cambridge Street, minimizing surface disturbances and disruptions to the community.

N-6-12 MassDOT and DCR are well aware of the need to synchronize the range of transportation projects scheduled for the next 10 to 20 years. Coordination of the construction period with other transportation projects in the vicinity, as summarized in Section 3.5, is essential to minimize area-wide impacts to traffic flow. No construction timeframe has been identified. The Project would likely not be constructed concurrently with the Longfellow Bridge Restoration Project or the Storrow Drive Tunnel Project.

↑ Connector project but also other major transportation projects that are likely to occur in the same vicinity and during the same time period. MEPA regulations require that an EIR examine the “cumulative impacts of the Project, any other Projects, and other work or activity in the immediate surroundings and region.” 301 CMR 11.07(6)(h) As you know, a variety of transportation reconstruction projects are currently being planned in the vicinity of Charles Circle and extending westward down the Charles River basin. These include the reconstruction of the Storrow Drive tunnel, currently in the MEPA review process, and the reconstruction of the Longfellow Bridge, which we understand will soon be initiated with the filing of an Environmental Notification Form.

MEPA needs to play a constructive and active role in ensuring that cumulative construction period impacts of all Charles River Basin transportation projects “in the immediate surroundings and region” are considered in the EIR for the Connector and, indeed, for each of the individual projects. The Scope should require EOT to include a comprehensive and coordinated construction schedule and mitigation plan for all planned projects that affect the same trip origins and destinations and roadway network.

Partners believes that the simultaneous and overlapping implementation of these very necessary projects will present EOT with both challenges and opportunities. Clearly roadway construction will constrain automobile access to the Project area over an extended period of time. By coordinating these projects, however, benefits can be gained. For example, during the reconstruction of the Longfellow Bridge, traffic accessing Cambridge Street will undoubtedly be reduced—creating a perfect opportunity to undertake excavation work for the Red Line-Blue Line connector. Expedited and early completion of the Connector could itself serve as a mitigation measure to provide improved transit service and expanded transit capacity during the extended construction period for the Longfellow Bridge, Storrow Drive tunnel and other roadway projects, a time when automobile access will be impacted.

N-6-13

Finally, given the centrality of the issue of reducing construction period impacts and the large number of stakeholders who will be affected, Partners urges you to be creative in devising an EIR development process that ensures broad-based participation. Because no Special Review Procedure has been requested or is necessary, the formal mechanism of a Citizens Advisory Committee is not applicable under the MEPA regulations. However, EOT could convene a less formal working group or task force to ensure the ongoing involvement of concerned neighbors and stakeholders in both the analysis of construction period impacts and the preparation of a detailed mitigation plan. Massachusetts General Hospital would be pleased to participate in such an effort.

N-6-14

4. **Partners Supports the Preparation of a Single EIR for the Red-Blue Connector**

↓ The Executive Office of Transportation has submitted an Expanded Environmental Notification Form and requested that you allow the preparation of a single EIR, rather than a draft and final EIR. MEPA regulations allow for the preparation of a single EIR

N-6-13

A Working Group for the Red Line/Blue Line Connector Project has been established, as described in Section 1.5.

N-6-14

The Secretary's Certificate on the EENF took your comment into consideration and scoped accordingly.

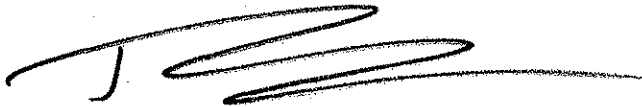
↑ upon the filing of an EENF that meets the regulatory requirements specified in 301 CMR 11.06(8). A single EIR is allowed if the EENF “describes and analyzes all aspects of the Project and all feasible alternatives” and “demonstrates that the planning and design of the Project use all feasible means to avoid potential environmental impacts.” As EOT notes in its filing, both the route and the technology to be used in this transit project have already been decided, substantially narrowing the scope of issues to be explored and addressed. On the other hand, these comments and those of other stakeholders indicate that EOT has a significant amount of work remaining both with respect to the analysis of feasible alternatives and with respect to addressing potential impacts, especially during the construction period.

EOT could address these important issues in a single EIR, as long as the document is comprehensive and responsive to your Scope. Alternatively, EOT could prepare a draft EIR under a timeline consistent with the regulatory deadline and, if this draft comprehensively addresses all issues, you have the authority under 301 CMR 11.08(8)(b) to review the document as a final EIR if you find “that no substantive issues remain to be addressed.” Whatever is decided about the appropriateness of a single EIR, Partners’ goal is that the MEPA process address and answer all of the issues necessary to move ahead with the Connector—and do so in a timely manner that ensures the completion of final design and engineering by the deadline specified in state regulation and in the modified State Implementation Plan regulations currently under review by the Environmental Protection Agency.

N-6-15

Thank you for your consideration of these comments.

Sincerely,



Thomas P. Glynn

N-6-15

The Project is governed by 310 CMR 7.36; that regulation requires that the final design for the Red Line/Blue Line Connector Project be completed by December 31, 2011. The Project is on schedule to meet that deadline.



WalkBoston

LATE COMMENT

RECEIVED

NOV 13 2007

MEPA

November 7, 2007

Secretary Ian Bowles
Executive Office of Environmental Affairs, MEPA Office
100 Cambridge Street, Suite 900
Boston, MA 02114

RE: Comments on the Expanded Environmental Notification Form for the Red Line/Blue Line Connector project in Boston's West End
EOEA # 14101

Dear Secretary Bowles:

WalkBoston appreciates the opportunity to comment on the Expanded Environmental Notification Form for the Red Line/Blue Line Connector project. We are commenting because of concern about the pedestrian connections to this site.

We have several concerns:

N-7-1

A. **Data needs.** Pedestrian data for the project setting should be updated with a base condition that includes the recent Cambridge Street reconstruction and the Charles/MGH Station as it was just rebuilt, and future Red Line/Blue Line build and no-build conditions. Because data on existing and anticipated ridership is brief, the effects of a new Blue Line station at Charles Circle and closure of Bowdoin Station need to be more fully explored in future filings. The assessment should include the future number of pedestrians and how they will use various routes to enter or leave the stations.

N-7-2

B. **Bowdoin Station.** Bowdoin Station is very close to Government Center Station. (So close, in fact, that one future option may permit riders to connect to the western end of the Blue Line platform at Government Center Station). Alternatives to Bowdoin Station should include this option. If the station is abandoned, it is unclear if the small park at the entrance to the current Bowdoin station will be retained when the station is removed; alternative uses for the site should be explored.

N-7-3

C. **Charles/MGH Station.** The proposed physical connections between a Blue Line terminal station, the Red Line's Charles/MGH Station and the surface streets/sidewalks are confusing. The EENF includes conflicting alternatives (see below) and this issue needs clarification and discussion.

N-7-4

▪ "No new station entrances will be constructed. Access to the proposed Blue line Charles/MGH Station will be through the existing headhouse." (EENF Transportation – Traffic Generation Section, II-c, p. 18.)

N-7-5

▪ "Station access will be provided on both the north and south sides of Cambridge Street via underground passageways." (Project Description, p. ES-3.)

N-7-6

▪ "The proposed design concept removes the existing elevated walkways and station headhouse and provides new access to an underground mezzanine lobby through

N-7-1 Existing pedestrian level-of-service information is provided in Section 4.5, based on field observations made in April 2009. Future conditions for pedestrians, under both the No-Build and the Build Alternatives, are described in Section 5.5. Modest increases in the number of pedestrians are anticipated, and the existing walkways (sidewalks) have adequate capacity to accommodate the additional pedestrian traffic. The survey and modeling are described in the Traffic Technical Report, appended to the Alternatives Analysis Technical Report (provided on the Project website, www.mass.gov/massdot/redblue).

N-7-2 If Bowdoin Station is eliminated, the headhouse would remain for emergency egress. The adjacent Cardinal Cushing Park would not be affected by the Project, although pedestrian access may be temporarily altered (by walkways) during construction.

N-7-3 Sections 3.3.2 and 3.3.3 describe the connections between the Blue Line platform and the headhouse at Charles/MGH Station, as well as surface streets and sidewalks. There is no difference between the two Build Alternatives in these connections. The cross sectional view provided in Figure 3-4c shows the underground configuration of the Blue Line platform at Charles/MGH Station.

N-7-4 See response to comment N-7-3.

N-7-5 See response to comment N-7-3.

N-7-6 See response to comment N-7-3.

↑ new development on the north and south sides of Charles Circle.” (3.5 Preliminary Station Architecture, p. ES – 10.)

N-7-7

▪ The Figure I map – Preliminary Track Plan and Profile, Sta. 10+00 to 19+50 – indicates underground passageways from the station to the two sides of Cambridge Street.

N-7-8

▪ The project is described as being entirely within the right of way of Cambridge Street, but there are some possible exceptions at Charles Circle, where stairs and elevators may be needed to give access to underground passageways.

N-7-9

D. **Reconstruction of Cambridge Street.** Cambridge Street will need to be rebuilt again if construction of the Blue Line Extension goes forward. If this happens, WalkBoston requests that the pedestrian deficiencies in the new Cambridge Street be alleviated. (Cambridge Street Pedestrian Flows, pp. ES-7 and ES-8.)

Thank you for the opportunity to comment on this EENF. We look forward to your review of the proposal.

Sincerely,



Robert Sloane
Senior Planner

N-7-7 See response to comment N-7-3.

N-7-8 The majority of the Project would be within the Cambridge Street right-of-way, as described in Section 4.2. The western extent of the Project, including the Blue Line platforms at Charles/MGH Station and the two tail tracks, extend underground under Charles Circle. Charles Circle is occupied by Charles/MGH Station, and is part of the Charles River Reservation.

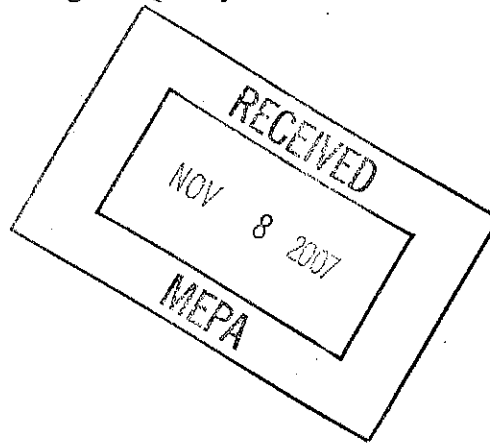
N-7-9 The proposed construction method has been changed to include tunnel boring, rather than cut-and-fill excavation, for the majority of the track alignment, as described in Section 3.3. This method would minimize surface disturbance, preserving the new landscape and streetscape along Cambridge Street except for short segments at either end. Any disturbed landscape or streetscape, including sidewalks, would be restored at the conclusion of the construction period. Current pedestrian level-of-service at intersections along Cambridge Street are described in Section 4.5. Neither Build Alternative would substantively impact pedestrian volumes, as described in Section 5.5, and the existing sidewalks have sufficient capacity for projected pedestrian volumes. Decreases in vehicle traffic volumes along Cambridge Street may also positively impact pedestrian flow.

WEST END CIVIC ASSOCIATION

Committed to Enhancing the Quality of Life in Our Community

November 8, 2007

Secretary Ian A. Bowles
EOEEA, Attn: MEPA Office
Holly S. Johnson, EEA No. 14101
100 Cambridge St, Suite 900
Boston, MA 02114



Dear Mr. Secretary:

We wish to comment briefly on the project of joining the Red and Blue MBTA lines.

N-8-1

1. As our concern is the quality-of-life of the residents of the West End, the prospect of a renewed major disruption of Cambridge Street – after we have just gone through several years of its reconstruction – fills us with great misgivings. Even partial blockage of the crossing streets will not only severely affect Mass. General Hospital but all residents of the area who depend on driving into and out of the West End. We noted in the MTA charts the concern for the residents of Beacon Hill and ask that equal attention be given to those living on the opposite side of Cambridge Street.

N-8-2

2. As stated at the recent meeting, the combined major projects of the Memorial Bridge repairs, the Storrow Drive Tunnel (now postponed but not deleted) and the MBTA Connector project implies endless years of further inconvenience to our neighborhood. We ask that these actions be spaced over a reasonable time period to minimize disruption to our area.

N-8-3

3. Alternatives to a subway tunnel extension should be considered.

Sincerely

Marie Cantlon
President

WEST END CIVIC ASSOCIATION
P.O. Box 6503, Boston, MA 02114
Tel. 217-720-3992. E-mail: prosework@aol.com
Marie Cantlon, President

N-8-1 As described in Section 6.5, detours and, as necessary, police details would be used to manage local traffic. There would be no loss of parking for residents. A traffic management plan would be developed to discourage cut-through traffic along residential streets in both Beacon Hill and the West End throughout the Project construction period. Cross streets intersecting Cambridge Street would not be blocked expect temporarily at certain locations. An account of traffic operations during construction is provided in the Traffic Technical Report, appended to the Alternatives Analysis Technical Report (provided on the Project website, www.mass.gov/massdot/redblue).

N-8-2 The Project would be consistent with other transportation projects planned or scheduled in the vicinity of the Cambridge Street corridor, as described in Section 3.5. Currently, the Red Line/Blue Line Connector Project is not scheduled or programmed for construction, and would be unlikely to be constructed concurrently with these projects. The Construction Phasing Plan and Traffic Management Plan are conceptual at this time, based on the current level of Project design, and will be refined as the Project advances to final design. Each plan is, and would continue to be, flexible to allow for integration with other nearby transportation projects as necessary.

N-8-3 Final design of a subway tunnel extension is required by the DEP's Transit Regulations, at 310 CMR 7.36. An underground people mover, suggested by several commentors as an alternative to the subway tunnel extension, would not meet the regulatory requirement.

Secretary Ian A. Bowles
 EOEEA, Attn: MEPA Office
 Ms. Holly S. Johnson,
 EEA No. 14101
 100 Cambridge Street,
 Suite 900
 Boston, MA 02114

November 7, 2007

Subject: Red Line/Blue Line Connector

Dear Mr. Bowles,

On behalf of many residents in the West End of Boston, we are pleased to see that this long awaited project is moving forward. Connecting the Red Line to the Blue Line at Charles/ MGH Station is a major step in improving the public transportation system in the city and the region. The connection is likely to increase the reliability of the public transportation and reduce auto dependency.

We offer the following comments on the project concept:

- 1- The proponent presented one alternative. In this alternative, the Blue Line tracks extend under the Charles/MGH Station and new Blue Line platforms will be built. This alternative will consider the elimination of the present Bowden Street Station.

O-1-1

We have identified a second alternative as follows:

- a. The Blue Line Bowden Street Station can be moved to a new location at the end of existing tracks.
- b. A passenger path (concourse) could be tunneled from the Charles/MGH Station to the new Station.
- c. Conveyor walkways could help passenger movement through the tunnel between the stations.

Advantages of this alternative are:

- a. Passengers tunnel will be smaller than the proposed two tracks and platform tunnel.
- b. Passengers tunnel could be deeper as it is not restricted to track profile.
- c. Passengers tunnel could be constructed using tunneling techniques rather than the proposed cut and cover method. This will reduce the amount of work needed on the newly constructed Cambridge Street.
- d. Entrances and exists along the passenger tunnel could be constructed. MGH could be linked directly to the tunnel. This would minimize the congestion at Charles/MGH Station and the pedestrian crossings that lead to it.
- e. The present Bowden Station tracks could be used for train cars storage.
- f. Reducing the surface work will minimize the construction impacts on vehicular traffic, pedestrians, and environment.
- g. This alternative is likely to be less expensive than the first alternative.

O-1-2

- 2- This project should be reviewed with a futuristic vision for Boston and the region. The expansion of the public transit system is essential for the improvement of the city. Future extension of the Blue Line beyond the Charles/MGH Station should be considered. One possibility is consideration of extending the Blue Line to Copley Station, Symphony, and to Heath Street under existing E Branch of the Green Line.

Advantages of such extension are:

- a. Direct connection from the airport west part of the City via rapid transit.

O-1-1

The suggested alternative would not meet the regulatory requirement of 310 CMR 7.36, and was not considered in the DEIR.

O-1-2

The purpose of this Project, as required by the Transit Regulation cited in the response to Comment O-1-1, is to connect the Red and Blue Lines, not to extend Blue Line service to areas already served by the Green Line.

- b. Rapid transit connectivity to the Life Science industries in Boston and the region. This includes direct connection from the airport to the Longwood Medical Area and direct connection between MGH and the Longwood Medical Area. Also, it would reduce the number of shuttle buses running between these two major institutional areas
- c. Increase ridership capacity of the Green Line. The Green Line operation is at full capacity between Copley and Government Center Station. By eliminating the E line branch, all present E line trains will serve the B, C, and D Lines.
- d. Improving the conditions of Huntington Avenue by eliminating the surface tracks, widening the sidewalks, and the traffic lanes.

O-1-3

- 3- With similar futuristic vision for Boston, the possibility of extending the Blue Line under the Charles River to Allston and Brighton communities should also be considered. This underground rapid transit connection will improve the public transportation, reduce the pressure on the Green Line surface light rail, and reduce traffic congestion in these communities.

The configuration of the tunnels and the track alignments at the Charles/MGH Station connection should be established with potential for the above mentioned future expansion in mind.

Also, we offer the following comments regarding the project construction:

O-1-4

- 1- We can't emphasize enough the importance of preserving the almost completed Cambridge Street.

O-1-5

- 2- Coordination is needed between the projects in the area that are slated for construction in the next ten years. The project list includes but is not limited to; Longfellow Bridge, Storrow Drive Tunnel, Craigie Draw Bridge, Craigie "Dam" Bridge, BU Bridge, etc.

O-1-6

- 3- Construction in the Beacon Hill and West End has been ongoing for many years. Residents would not accept additional disruption to their lives with all these additional construction projects. Construction should have minimum impact on the residents.

O-1-7

- 4- Impact on traffic is a major concern also. Construction should have minimum impact on traffic flow in the area.

We thank you for the opportunity to present our comments and we look forward to working with you and MEPA Office on this very important project.

Yours truly



Malek Al-Khatib
8 Whittier Place
Unit 12-F
Boston, MA 02114
Tel: 617-723-4027

CC: State Representative Marty Walz
State Senator Anthony Petrucci
City Councilor Michael Ross
John Achatz, BHCA
Robert O'Brian, DNA
Marie Cantlon, WECA.

O-1-3 See response to comment O-1-2.

O-1-4 The proposed construction method has been changed to include tunnel boring, rather than cut-and-fill excavation, for the majority of the track alignment. This method would minimize surface disturbance, preserving the new landscape and streetscape along Cambridge Street. Any disturbed landscape or streetscape would be restored when the construction activities are finished.

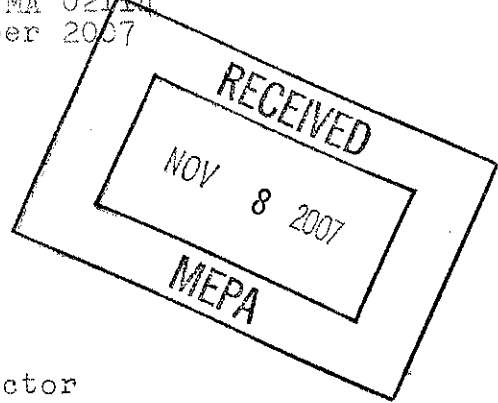
O-1-5 Project coordination with other transportation projects in the vicinity is described in Section 3.5.

O-1-6 As described in Chapter 6, the construction period impacts to residents have been minimized to the extent practical, based on the current level of design.

O-1-7 Impacts to traffic flow during construction are described in Section 6.5, and have been minimized to the extent possible based upon review of existing traffic operations and projections for the future. An account is provided in the Traffic Technical Report, appended to the Alternatives Analysis Technical Report (provided on the Project website, www.mass.gov/massdot/redblue).

HJ

112 Pinckney St.
Boston, MA 02114
7 November 2007



Secretary Ian A. Bowles
EOLSA, Attn: MEPA Office
Molly S. Johnson, EEA No. 14101
100 Cambridge St., Suite 900
Boston, MA 02114

Re: EEA No. 14101 - Red Line/Blue Line Connector

Dear Secretary Bowles:

The proposed Red Line/Blue Line Connector project involves the construction of an extension of the MBTA's Blue Line subway under Cambridge Street to connect to the Charles/MGH Red Line station.

O-2-1

In summary, this project would have a substantial adverse impact on the Beacon Hill community. In the first place, the proposed project would require the construction of a cut-and-cover tunnel under the recently-reconstructed Cambridge Street, which has been some five years in implementation. It would destroy all of this work, long awaited by the Beacon Hill community, and result in the waste of hundreds of millions of scarce transportation funds that have been spent on reconstructing this street. All of these improvements would have to be redone. The lack of any coordination, should this project go forward, is clearly shortsighted on the part of the Commonwealth.

O-2-2

Further, with the scheduled rehabilitation of the Storrow Drive tunnel and of the Longfellow Bridge, both vitally necessary for public safety, programmed to occur during the same time period, the resulting impact on traffic in the area would be disastrous. Cambridge Street is a major arterial into downtown Boston, and the consequent disruption of traffic during construction of the tunnel and the other proposed projects would result in significant adverse impacts on traffic flow and circulation, including the potential for substantial redirected traffic on local Beacon Hill streets, endangering the lives of residents, especially the many elderly and children who live in the neighborhood.

O-2-3

The estimated schedule for the project (a 4-year construction period) is clearly unrealistic. As has been evidenced by such projects as the Central Artery reconstruction (the "Big Dig") and the reconstruction of Cambridge Street itself, the Connector project cannot be expected to be completed within the estimated time frame.

O-2-1

As described in Sections 3.3.2 and 3.3.3, both Build Alternatives would be constructed by a combination of mined tunnel, sequential excavation mining, and cut-and-cover excavation. The mined tunnel method would be used for the majority of the alignment under Cambridge Street, minimizing disturbance to the recently completed renovation project. Open excavations, where required for boring machine installation or extraction, specific subsurface construction features, or to accommodate curves in the alignment, are minimized with this approach. Open excavations would be covered with decking whenever possible to allow continued traffic flow. Any disturbed landscape or streetscape features would be restored at the conclusion of the Project.

O-2-2

MassDOT and DCR are well aware of the need to synchronize the range of transportation projects scheduled for the next 10 to 20 years. Coordination of the construction period with other transportation projects in the vicinity, as summarized in Section 3.5, is essential to minimize area-wide impacts to traffic flow. Project-specific detour routes are shown in Figure 6.5-1, based on the current level of design. These preliminary detour routes may be refined as the Project progresses to final design, and further revision may occur as the Project construction is coordinated with other transportation projects. There is no scheduled date for construction at this time, and a funding source has not been identified.

O-2-3

The current estimated Project duration of 6.5 years is based upon available information and the current level of design. Refinements to the Project schedule may occur as the Project progresses to final design.

↑ Rather, the construction period more realistically would be expected to be two to three times longer, with the resulting disruption of traffic and other adverse impacts on the Beacon Hill community more likely lasting eight to ten years. The MBTA cannot be expected to be any more efficient than the State Highway Department in constructing its projects. Even the Charles Street station rehabilitation, some two years in reconstruction (and certainly a far less complicated project) still is not completed (even though the station officially opened in April); work goes on every day and the end appears nowhere in sight. The reconstruction of the Arlington St. station is another example of a delayed schedule.

O-2-4

The ridership estimates of the MBTA for this project most likely are out-of-date and substantially overestimated. With the opening of the Silver Line giving direct access to the Logan Airport terminals, there is no reason to expect anyone to transfer from the Red Line to the Blue Line and again to a bus to access the terminals (an added transfer) rather than transferring to the Silver Line at South Station. Therefore, any estimate of a Red Line/Blue Line transfer for this purpose, which was a major justification for this project, must be eliminated. In turn, this would affect the ridership estimates as well as the cost effectiveness analysis of the project.

O-2-5

Interestingly, there is no mention in the Expanded Environmental Notification Form (EENF) that this project has been imposed on the MBTA by the Conservation Law Foundation as a Central Artery reconstruction "mitigation".

O-2-6

It is particularly disturbing that the Executive Office of Transportation (EOT) failed to publish any notice of this EENF in the Beacon Hill Times, which is the local newspaper serving the Beacon Hill community that is most affected by this proposed project, while notices were published in newspapers serving communities such as East Boston, Chelsea, and Somerville, which are in no way affected by the project. Obviously, it would appear that EOT wished to keep the Beacon Hill neighborhood, whose quality of life would be significantly and adversely affected for eight to ten years, in the dark about this project. Further, neither the City Councillor for Beacon Hill (Michael Ross) nor its representative at the Legislature (Marty Waltz) were personally submitted copies of the EENF, leaving them also uninformed regarding the project.

O-2-7

Finally, I strongly object to the request of EOT to file only a single Environmental Impact Report (EIR). This project is sufficiently complicated, and its impacts significantly adverse on the Beacon Hill neighborhood, that both a Draft and a Final EIR are required. Significant issues can be expected to be raised in the EIR that will require response in a Final EIR. Therefore, I recommend that you reject the request of EOT to file a single EIR and require both a Draft and a Final document.

O-2-4 The ridership estimates provided in Sections 3.3.2 and 3.3.3 for the two Build Alternatives are based upon the latest available information from MBTA statistics and CTPS modeling.

O-2-5 The Project is intended, in part, to offset increased automobile traffic resulting from the recently completed Central Artery/Tunnel project.

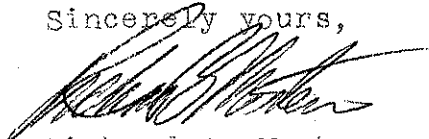
O-2-6 The Beacon Hill Times has been added to the distribution list, and a notice for the most recent Project meeting was published in that newspaper as well as the East Boston Times and the Revere Journal. Councillor Ross is on the Project mailing list and Representative Walz is a member of the Working Group and thus will receive a copy of the DEIR.

O-2-7 The Secretary's Certificate on the EENF took your comment into consideration and scoped accordingly.

O-2-8

The Red Line/Blue Line Connector project can be expected to result in substantial adverse, and long-lasting, impacts on the Beacon Hill neighborhood and significantly affect the quality of life of its residents. The MBTA would do far better to spend its limited funds on improving its existing service and facilities, which are abysmal at best, rather than diverting them to a project of limited benefit. Will the citizens of this Commonwealth be further burdened by another fare increase to pay for this project? This proposed project requires the closest scrutiny and analysis of its substantial impacts, especially on the community that will be most affected by its implementation.

Sincerely yours,



Richard B. Mertens

cc: Mr. David J. Mohler
Acting Deputy Secretary
Executive Office of Transportation

O-2-8

Permanent and temporary impacts that would result from either Build Alternative are described in Chapters 5 and 6, and include both beneficial and adverse effects. Final design of the Project is required by the Transit Regulations, 310 CMR 7.36, and must be completed by December 31, 2011. Funding for construction is not currently available.

P C Napier
1 Bellingham Place
Boston, MA 02114
17 Oct 07

Ms. Holly S. Johnson
EEA No. 14101
EOEEA MEPA Office
100 Cambridge Street Suite 900
Boston, MA 02114

Dear Ms. Johnson:
Re: Red Line / Blue Line Connector

Further to the meeting held today regarding the above referenced project, below is a written record of my comments submitted for consideration by your project management group:

- O-3-1 1. Serious consideration should be given to an alternative of providing a bored pedestrian tunnel underneath Cambridge Street, connecting the existing Blue Line terminus at Bowdoin Street with the Red Line Charles Street / MGH line new station. This would be a powered "people conveyor/moving walkway", not an MBTA subway link. I believe that an up to date study would find that this to be a lower "total cost" vs. the alternative of a dig and fill excavation between the two stations for installation of an MBTA Blue Line extension to the Charles Street station. This alternative method of linking the two lines would also cause a much reduced disruption to the traffic and businesses on Cambridge Street and Beacon Hill. As I'm sure that the project construction experts will appreciate, this method of constructing subway systems around the world, in countries like France, England, Russia etc. is a known and state of the art method of building subways, as opposed to the dig and fill method proposed.
- O-3-2 2. Although the MBTA representative at the meeting advised that there was not a plan to incorporate continuously welded rails and shock absorber mountings to the rails, in order to minimize noise and vibration to adjacent structures, this type of construction should definitely be planned. Let's not have another 3 – 5 years of "improvements" such as have been tried on the Red Line Park Street to Charles Street stretch of track, to offset poor construction methods.
- O-3-3 3. As part of the study investigations, measurements should be taken to ensure that the proposed new Blue Line extension does not negatively impact abutting properties to Cambridge Street on Beacon Hill for noise and vibration.
4. Please ensure that I am advised of any relevant reports or meetings planned on this project.

Yours sincerely,

P C Napier

O-3-1 The suggested alternative would not meet the regulatory requirement of 310 CMR 7.36, and was not considered in the DEIR. The two Build Alternatives considered in the DEIR, as described in Sections 3.3.2 and 3.3.3, would include a mined tunnel construction method for much of the alignment under Cambridge Street, considerably reducing the surface disturbance that would result from the full cut-and-cover excavation method described in the EENF.

O-3-2 The noise and vibration analyses, provided in Sections 5.7 and 5.8 for permanent impacts, determined that ground-borne noise caused by vibration from rail joints at the crossover location, would impact sensitive receptors. Proposed mitigation measures include the installation of spring-rail frogs, moveable-point frogs, or flange-bearing frogs to eliminate the impact at these locations.

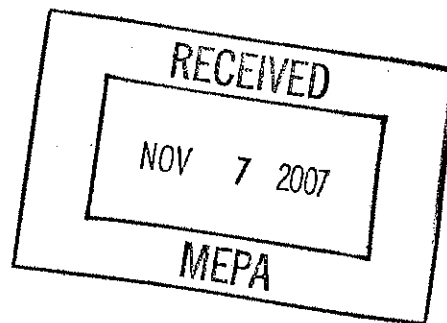
O-3-3 Sections 5.7 and 5.8 describe the anticipated impacts to sensitive receptors from noise and vibration, based on measurements of ambient levels identified in Figure 4.7-1 and modeled noise and vibration from the Project sources. As noted in the response to Comment O-3-2, noise impacts can be mitigated and there are no vibration impacts.

HJ O-4

November 6, 2007

EDWARD O. NILSSON, AIA, NCARB
GARY J. SIDEN, AIA, NCARB

Secretary Ian A. Bowles
EOEEA, Attn: MEPA Office
Holly S. Johnson, EEA No. 14101
100 Cambridge Street, Suite 900
Boston, MA 02114



Re: **Red Line/Blue Line Connector**
EOEA No. 14101

Dear Secretary Bowles:

O-4-1

This letter is to enthusiastically endorse the Red Line/Blue Line Connector as outlined in ENF 14101. As architect/planner and co-author of Rivervision 2020: A Charles River Basin Master Plan prepared under the auspices of the Boston Visions Program, I believe the proposed connector to be a critical link in the transportation planning of Boston's westerly corridor. Rivervision 2020 explores the possibility of connecting the Blue to the Green Line at Kenmore Square where it would then continue out to Route 128, providing direct connection to Logan Airport from the western suburbs, a parallel heavy rail service to the vulnerable Green Line for access to downtown, and also mass transit access to the riverfront with stations at the Hatch Shell and Massachusetts Avenue bridge. Most importantly, it would provide commuters with a choice by allowing for growth in the westerly corridor without dependence on the automobile.

O-4-2

The potential to link Charles/MGH Station with Kenmore Square can occur via several routes (i.e., along the riverfront, under Public Garden to Newbury St, etc.) as was explored in further detail in the Commonwealth's Program for Mass Transportation (1994). The design of the Red Line/Blue Line Connector station and terminus should anticipate extension of the Blue Line so that it may provide a relatively economical "missing link" in Boston's transit system. Connecting to Charles/MGH to Kenmore Square would mean that the Blue Line would no longer be the only branch connecting one end of the city to the center without passing through to the opposite side for maximum efficiency and ridership. For example, in addition to direct access from the North Shore to Kenmore Square, the Longwood medical area would greatly benefit from a more direct connection to MGH.

Please advise if this information is sufficient or if you have any questions.

Very truly yours,

NILSSON + SIDEN ASSOCIATES, INC.

Edward O. Nilsson

Edward O. Nilsson, AIA, Principal

Encl.



O-4-1

Thank you for your comment.

O-4-2

The Project is limited to design of the extension of the Blue Line to the Red Line, per the regulatory requirement cited above. However, coordination with other transportation projects, including extension of the Blue Line to Lynn, is taken into consideration in Section 3.5. The Project is consistent with the Lynn extension, which MBTA is considering as a separate project.

VIEWPOINT

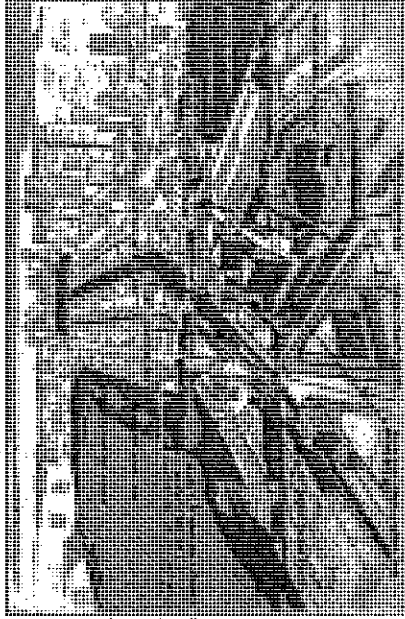
PERSPECTIVES ON OUR COMMUNITY

A long history of Storrow Drive improvement proposals

By Ed Nilsson, architect and planner, Nilsson + Siden Associates, Inc., Salem

The Back Bay Sun's 8/24/07 editorial envisions a more pedestrian-friendly Storrow Drive with enhanced access to the Esplanade and recommends that other options be considered for the current tunnel reconstruction project. Any option should be considered as part of a more comprehensive transportation/land-use plan. There are three potential long-range proposals that could help shape the future design of Storrow Drive.

The first proposal grew out of the 1988 Boston Visions competition entitled Rivervision 2020, the aim of which included improved access to the Esplanade by downgrading Storrow Drive and reconnecting it with its nearby neighborhoods. Subsequently presented to more than 30 neighborhood, business, and government planning groups, a key feature of the plan is downsizing Storrow Drive to a three-lane (center lane reversible) road similar to Commonwealth Avenue. Traffic would be reconfigured in a wider geographic modeling area, using the Massachusetts Turnpike for regional traffic and Storrow Drive only as a local collector-distributor. This was further explored in Access to the River - Rethinking the Role of Storrow Drive. An Opportunity for Transportation Planning With Urban Objectives, the MIT thesis by Peter Duer, a student of Fred Salvucci in 1992. The author advocates that "Rather than continuing to accommodate growth in vehicular travel and mitigating its environmental consequences, an urban/environmental objective is formulated first and transportation policies devised such as to best manage transportation resources under the stated objective".



An aerial view of a tamed Storrow Drive from the Rivervision 2020 competition of 1988.

The second project relates to the proposed extension of the Blue Line from Bowdoin Street to Charles Circle as part of the Commonwealth's settlement with the Conservation Law Foundation when the Big Dig was modified into its present form. A major component of the Rivervision 2020 plan is extension of the Blue Line from Charles Station in a tunnel that would continue along the Charles River, generally on the alignment of Storrow Drive, to Kenmore Square.

There would be stations at the Hatch Shell (near Arlington Street), at Massachusetts Avenue, and at Kenmore. West of Kenmore, the extension would join the right-of-way of the Green Line D Branch, which it would use to Riverside (Route 128). This would provide

a parallel transit link from the western suburbs to downtown Boston to relieve the over-burdened and vulnerable Green Line and provide improved access to both an under-utilized riverfront and to Logan Airport. It would also allow for growth in transit capacity of the westerly corridor of Boston without reliance on the automobile. Detailed review of this concept was provided in the Commonwealth's Program for Mass Transportation in 1994.

The third and more current project, at the other end of Storrow Drive, is Harvard University's expansion at Allston Landing. The idea of moving regional east-west traffic onto a regional road, such as the Massachusetts Turnpike, instead of a local collector-distributor road like Storrow Drive, has been mentioned in the press as a way to detour Storrow traffic onto the Turnpike while the tunnel is reconstructed. Utilizing the residual capacity of the Turnpike in order to downgrade Storrow Drive should be both a temporary and a permanent solution. A rare opportunity exists for Harvard's plan to encourage traffic onto the Turnpike at Allston to help achieve a city-wide improvement to the riverfront, much in the way its own plan includes tunneling under the riverfront near the Business School to reconnect pedestrian access and make the automobile subservient to land-use needs rather than the other way around.

What is needed is a comprehensive plan combining environmentally-friendly transportation improvements with urban objectives, one that adds context to the current discourse surrounding the Storrow Drive tunnel.