

December 30, 2009

Secretary Ian Bowles
Executive Office of Energy and Environmental Affairs
MEPA Office
Attn: Holly Johnson, MEPA Analyst
EEA #13886
100 Cambridge Street, Suite 900
Boston, MA 02114

Dear Secretary Bowles:

I am writing to comment on the Draft Environmental Impact Report (DEIR) for the Green Line Extension project to Medford, EEA #13886.

First of all, I strongly support the Green Line extension, and urge that it be built in the most practical, beneficial and cost-effective manner – that is, to construct the entire project in one phase, with a terminus station at Mystic Valley Parkway (Route 16), by December 31, 2014.

The DEIR is encouraging in that it concludes that the Route 16 station would provide the most benefits according to all project criteria, including air quality and environmental justice. However, MassDOT states that it is incapable of building (and funding) the entire “Preferred Alternative,” so it only intends to build the extension to College Avenue in the Tufts University area of Medford, by its deadline of December 31, 2014.

In my opinion, the DEIR as currently written does not serve the best interests of the project. More importantly for your review, it was not done in a way that “adequately and properly” complies with the state environmental regulations, nor with the December 1, 2006 MEPA certificate that defined the requirements of the DEIR.

For the following reasons, I strongly urge you to not accept the DEIR as the Final EIR and require further environmental analysis of the project by MassDOT:

1. A two-phased approach is unacceptable. The Route 16/Mystic Valley Parkway Station should be built as part of a single-phase project to minimize costs and negative impacts and achieve the maximum benefits with regard to ridership, vehicle mile travel reduction, air quality improvements, and service to environmental justice communities.

The recommendation as outlined in the DEIR is for the Route 16/Mystic Valley Parkway station to be a **separate** stand-alone Phase II project with no funding source identified. **This means, Route 16 may never be built.**

There are many, many problems with the Phase II approach, including:

- **Risk.** Without an identified funding source there is a very high probability that Route 16 will never be built and the implications of this are critical.
- **Terminus Impact.** Without a Route 16 Station, the College Avenue stop (designed and intended to be an **interim station**) would become the de facto terminus for the Green Line extension. It is not designed for a terminus and due to the traffic flow and

neighborhood density, as well as the lack of opportunity for transit-oriented development at College Ave., it is not a good location for a terminus.

- **Cost.** The two-phased approach is fiscally irresponsible and by MassDOT's own estimates will inflate the cost by \$55 million over a single-phase approach. Severing a single stop (less than one mile of track) from the project as a whole will cost the state, and thus the taxpayers, significant additional money. There are obvious ways to easily reduce costs in the overall project and provide enough additional funds to include Route 16 as part of a single, complete project. This is the most prudent approach, and also would ensure that the project produces the air quality improvements the Commonwealth must achieve to come into compliance with the Clean Air Act.
- **Project Management.** There are significant efficiencies gained from completing the project in one phase, rather than the starts and stops required to execute on separate, multi-stage efforts for such a small add-on project as a single station stop.
- **Environmental Justice:** The environmental justice population cited, in part, to justify the project as a whole will largely not be served if the project terminates at College Avenue. The negative aspects of this project will affect them most, while they will receive the least benefit without service to a Route 16 terminus.
- **Legal Mandate:** The state is legally obligated to provide public transit services to Medford Hillside by December 31, 2014, and stopping the extension at College Ave. fails to meet this legal obligation. At a minimum, this incurs significant mitigation costs required if the obligation is not met.

2. College Avenue should not be a terminus. The College Avenue station is not designed for the additional requirements of a terminus. The neighborhood cannot sustain the impact of a terminus station operations and traffic volume and the potential environmental damage is of serious concern.

3. The Route 16 station design is inadequate. The DEIR offers only a "worst case scenario" (MassDOT's description) for the Route 16 station design, while offering optimized station designs for all other Green Line extension stations. The Route 16 station design must be revisited. The Medford Green Line Neighborhood Alliance, a volunteer citizen group, has offered an alternative station design that prevents two major commercial property acquisitions and the resulting job displacement, preserves \$182,000/year in property taxes for the City of Medford, optimizes traffic flow and better serves the integrity of the station's surroundings. MassDOT apparently has been exploring similar improved designs, which should be presented to the public for comment. A \$1 billion project deserves a higher caliber design than a "worst case scenario."

To summarize, there is much more work to be done on the Environmental Impact report, and I strongly urge you to reject the DEIR in its current form and instruct MassDOT to perform the required further environmental analysis in order to make the Green Line extension the best project it can be, and MUST be.

Thank you.

Pat Citizen

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