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MGNA Green Line DEIR Analysis

MAIN POINTS

The Draft Environmental Impact Report (DEIR) should NOT be accepted as the Final Environmental Impact Report (FEIR), because the DEIR fails to fulfill the requirements set forth by the Executive Office of Environmental Affairs in its Dec. 1, 2006 MEPA Certificate on the Expanded Environmental Notification Form.

According to the Certificate, in order to be accepted as an FEIR, the DEIR must provide a “reasonably complete and stand-alone description and analysis of the project, project alternatives and environmental impacts, and adequately address mitigation.” Further, the Certificate states that the DEIR should “investigate all feasible methods of avoiding, reducing or minimizing impacts to land.”

The DEIR fails to meet these requirements in numerous ways, most significantly by:

- **Failing to analyze and design the Mystic Valley Parkway (Route 16) station to minimize impacts and maximize the benefits.** In fact, the DEIR presenting what MassDOT describes as a “worst-case scenario” for the station – the only element of the project treated in such a fashion.
- **Failing to fully analyze the impacts of a College Avenue station as the terminus** on the main branch to Medford, which it is proposed to be in Phase I of the project construction.
- **Failing to fully address mitigation measures**, particularly in the Medford Hillside area, which will NOT be served by the Green Line extension if it terminates at College Avenue, but will bear additional burdens of increased vehicular traffic through the neighborhood, as well as construction impacts and effects of a terminus station that would not be felt if Route 16 were the terminus.

Despite being filed 10.5 months after the Dec. 1, 2008 deadline, the DEIR is materially deficient in almost every category.

Therefore, the Secretary of Environmental Affairs should require MassDOT to continue the Environmental Impact analysis in the form of a Final Environmental Impact Report that addresses the many outstanding issues, most importantly the complete analysis of the Mystic Valley Parkway (Route 16) station.

Further, MassDOT should be required to re-evaluate a schedule in which it will construct what the DEIR describes as the Preferred, Full-Build Alternative -- that is, a terminus station at Route 16 with no parking – in one phase by Dec. 31, 2014, in order to achieve the maximum environmental benefits of the project without delay and within the commonwealth’s legal deadline.

SPECIFIC POINTS

SUPPORT FOR MYSTIC VALLEY PARKWAY TERMINUS AND ONE-PHASE CONSTRUCTION BY DEC. 31, 2014

We support the Mystic Valley Parkway (Route 16) terminus station, with no parking, as the Preferred Alternative. The DEIR clearly demonstrates that this alternative provides the maximum benefits from the project in regard to:

- Ridership (70% switching from auto travel)
- Reduction of vehicle miles traveled in the service region
- Air quality improvements
- Service to environmental justice communities.

It also demonstrates the acute need for better transit service in this neighborhood, as the intersection of Route 16 and Boston Avenue, had the second highest daily traffic volume (29,000 vehicles) in the entire project area.

HOWEVER, the station analysis is incomplete and its design is inadequate and inflicts unnecessary environmental impacts. MassDOT officials have publicly acknowledged putting forth the “worst case scenario” for the Route 16 station; this is not acceptable in a document that is required to minimize all negative impacts.

In addition, the Mystic Valley Parkway Station should be built as part of a single phase, otherwise the environmental benefits will be delayed or possibly never realized, as construction of Phase 2 is unlikely, at best.

A one-phase project build to Route 16 also is preferable because:

- By providing the greatest benefits with regard to air quality, mobility, ridership and environmental justice, the Preferred Alternative is the strongest regional project and would be most competitive in vying for federal funding.
- By MassDOT's own estimate, the cost of constructing the final leg of the extension, from College Avenue to Mystic Valley Parkway, would increase by \$50 million by undertaking it in a second phase between 2016-2020.
- Delaying the completion of the project into a second phase would push it outside the scope of the current MEPA and NEPA review process, requiring another complete review, additional costs and further delays. These are unlikely to be undertaken for the benefit of a single station.

SUPPORT FOR ALTERNATIVE DESIGN FOR MYSTIC VALLEY PARKWAY TERMINUS STATION

We applaud MassDOT for designing the stations in a manner that minimizes residential property takings and for not displacing any Medford residents. *HOWEVER*, the same effort has not been made for minimizing commercial property takings, particularly at the Mystic Valley Parkway Station.

We strongly advocate analysis of the Medford Green Line Neighborhood Alliance's alternative design for the Route 16 station, which demonstrates that adjusting the track curvature and platform

orientation would eliminate the need to acquire the commercial properties at 200 and 222 Boston Avenue, or a comparable alternative that accomplishes the same aims. This would reduce the project cost by at least \$15.4 million (the buildings' current assessed values) and preserving nearly \$200,000 in annual property tax revenue for the city of Medford.

MassDOT has stated publicly that it has a similar design that would not require these very large property acquisitions, job/company displacements and relocation costs. This "best-case" scenario for the Route 16 station, with a revised cost estimate, should be presented in a Final EIR.

The Route 16 station in the DEIR also is sorely lacking in pedestrian and bicycle access and accommodations, and is largely oriented for pick-up/drop-off ridership, unlike any of the other stations on the extension.

COLLEGE AVENUE STATION DOES NOT FULFILL THE STATE'S LEGAL OBLIGATION TO PROVIDE SERVICE TO MEDFORD HILLSIDE BY DEC. 31, 2014

We disagree that a terminus station at College Avenue fulfills the state's legal commitment to serve Medford Hillside, as the vast majority of what is generally considered the Hillside area is located from one-half to three-quarters of a mile from where service would terminate. (Extensive documentation from a variety of historic and current sources has been submitted to MassDOT.) Further, the Medford Hillside neighborhood would bear the additional burden of increased motor vehicle traffic destined for a terminus station at College Avenue, and would not receive mitigation measures such as sound barriers beyond the College Avenue station itself, even though increases in noise and vibration will be inflicted as far as Winthrop Street.

COLLEGE AVENUE TERMINUS STATION ENVIRONMENTAL IMPACTS HAVE NOT BEEN EVALUATED

The environmental impacts of a terminus station at College Avenue have not been fully evaluated. A terminus station would have a dramatically different operation and impact on the neighborhood than would a mid-route station; these impacts were not evaluated in the DEIR. The traffic impacts of a College Avenue terminus station also are understated and under-evaluated and require much further study. Finally, constructing the Medford Branch of the extension in two phases would result in unnecessary and undue disruption and other impacts to the College Avenue neighborhood.

CITIZENS OVERWHELMINGLY SUPPORT A ROUTE 16 TERMINUS

There is overwhelming community support for the Route 16 station, with more than 2,500 people signing a petition in its favor, including more than 1,200 from Medford. The Route 16 terminus station would serve nearly 10,000 residents of Medford, Somerville and Arlington living within a half-mile (10-minute) walk, who would not be within walking distance of a College Avenue terminus. Further, multiuse paths are being planned that will lead directly to the Route 16 station, from east and from west, further increasing ridership potential.

PROPOSED MITIGATION LACKS DETAIL, COMMITMENT

The DEIR recommends numerous mitigation measures, but they are often described with caveats such as "to the extent practicable" and "where feasible." There also is a lack of detail in the construction sequencing, which makes no mention of noise barrier installation, and the \$15.8 million estimated to be spent for noise mitigation falls below the MBTA's policy of committing 2% of a project cost to noise mitigation. MEPA should require a final EIR that includes binding commitments to

mitigation as well as additional mitigation measures such as cash payments to affected abutters, and retrofitting the existing commuter rail diesel locomotives with emission-reduction devices. It should commit to providing mitigation such as noise barriers *prior* to construction wherever possible.

MASSDOT HAS FAILED TO TAKE PUBLIC COMMENT AND OPINION INTO ACCOUNT

While MassDOT went through the motions of conducting public outreach and graciously honored meeting requests from citizen interest groups, there is precious little evidence that input from the public was taken to heart, except to support conclusions that they had already reached. In particular,

- 1) Comprehensive research to establish the extent of the area called "Medford Hillside" was neither accepted or rebutted.
- 2) Repeated questions about how the Winthrop Street station stop was dropped from consideration have been met with repeated unsubstantiated claims that community opposition prevented it from being seriously considered. MassDOT needs to document the objections that it considered when making this decision.
- 3) A June 11, 2008 letter to EOT from the State Legislative Delegation (Jehlen, Sciortino, Garballey, Donato) representing Medford and areas adjacent to the Route 16 station seeking analysis of alternative track configurations in the area of a Route 16 terminus went unanswered.
- 4) In May 2009, requests of EOT to participate in an attempt to redesign the trackwork around a Route 16 terminus in a way that reduced land takings were declined by EOT, in particular citing "limited staff availability."

MassDOT needs an opportunity to complete an FEIR in order to incorporate these public concerns into its plans.

LECHMERE STATION RELOCATION IMPACTS

Midway through the DEIR process, MassDOT was forced to assume the redesign and cost of the relocation of Lechmere Station as part of the Green Line extension project, because a developer was unable to fulfill its commitment to pay for the station relocation into the failed North Point project.

This has added approximately \$111 million to the cost of the project, or roughly the estimated cost of the College Avenue to Route 16 section of the extension. More than anything, this circumstance has forced MassDOT to relegate this final portion of the Green Line extension to Medford into a second phase, to be built sometime between 2016 and 2020, even though the DEIR demonstrates that the Full Build Alternative to Route 16 provides the greatest air quality benefits.

MEPA should require MassDOT to seek alternative funding for the Lechmere Station relocation, as well as redesigning major project elements such as the Route 16 station, to reduce costs in order for the entire project to be built in one phase by Dec. 31, 2014.

CONCLUSION

The new Massachusetts Department of Transportation is committed to make "investments and decisions that strengthen communities, support economic growth and improve public health." The Green Line extension is the perfect example of a project that will fulfill that mission, but only if it is built in the most environmentally beneficial and cost-effective manner, which is to continue the Environmental Impact Report in a manner that will enable the Commonwealth to construct the main branch to Route 16 in Medford in one phase by Dec. 31, 2014.