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MGNA Green Line DEIR Talking Points

Our opportunity to have the Green Line Extension serve Medford Hillside by going to Route 16 depends on getting a high volume of comments to the Executive Office of Energy and Environmental Affairs **by January 8, 2010**.

If proponents don't comment, the Draft Environmental Impact Report (DEIR) will be accepted: the extension will end at College Avenue when Phase I of the project is finished by December 31, 2014, and the extension to Route 16 most likely will not be built in our lifetimes. There will be extra burdens put on Medford Hillside by constructing the terminus station at College Avenue that would not arise with a Route 16 terminus station.

All comment letters that support a Route 16 terminus must include this statement or its equivalent:

- **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.

If the Secretary of Environmental Affairs agrees, he will require MassDOT to continue analysis and design modifications that address the concerns raised in comment letters, with continuing public input, until a satisfactory Environmental Impact report is created that ensures that the state meets or exceeds the legal commitments and environmental requirements of the project.

Here are recommendations for key points to be included in public comment letters on the Green Line extension Draft Environmental Impact Report, based on extensive analysis by the Medford Green Line Neighborhood Alliance:

- **We support MassDOT's designation of the Mystic Valley Parkway (Route 16) terminus station, with no parking, as the Preferred Alternative. However, the DEIR fails to analyze and design the Mystic Valley Parkway (Route 16) station to minimize impacts and maximize the benefits.** In fact, the DEIR presents what MassDOT describes as a "worst-case scenario" for the station – the only element of the project treated in such a fashion in the DEIR. The station analysis is incomplete and its design is flawed, inadequate, and inflicts unnecessary environmental impacts.
 - The DEIR clearly demonstrates that the Route 16 alternative provides the maximum benefits from the project in regard to ridership, reduction of vehicle miles traveled in the service region, air quality improvements, service to environmental justice communities, and potential for transit-oriented development.

- 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 petition was submitted to MassDOT, which was then called EOT, in August 2008.) The Route 16 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. And, multiuse paths are being planned that will lead directly to the Route 16 station, from east and west, further increasing ridership potential.
- 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.
- 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 (or a comparable alternative that accomplishes the same aims), 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, and obviate the sliver takings of residential property at the North end of Piggott Road. (MGNA requested a meeting with MassDOT and other stakeholders to discuss this option but was unsuccessful in getting the participation of MassDOT, which was then EOT.) This would reduce the project cost by at least \$15.4 million (the commercial buildings' current assessed values) and preserve nearly \$200,000 in annual property tax revenue for the city of Medford.
- MassDOT has recently 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.
- **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.
 - The DEIR fails 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.

- 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. And, 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.
- The DEIR fails 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.
- **Assuming the design and cost of the Lechmere Station relocation** into the Green Line extension project midway through the DEIR process added \$111 million to the total cost of the project, or roughly the estimated cost of the College Avenue-to-Route 16 portion of the extension that MassDOT says it must delay until a second construction phase, due to lack of available funding. Alternative funding for the Lechmere station relocation must be sought rather than using this setback to downsize the project to one that does not serve the original goals or legal mandates.
- **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.
- **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.

REMINDER: Comments on the DEIR must be received by January 8, 2010.

Send comments to:

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