

MGNA Green Line DEIR Evaluation

GENERAL COMMENTS

We support the Mystic Valley Parkway 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, VMT reduction, air quality improvements, and service to environmental justice communities. *HOWEVER*, the station analysis is incomplete and its design is inadequate and inflicts unnecessary environmental impacts. In addition, the Mystic Valley Parkway Station should be built as part of a single phase project to minimize costs and environmental impact and achieve.

We applaud EOT 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 require 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. 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.

We support the noise and vibration mitigation measures that will reduce these conditions below their current levels, even with the addition of Green Line service. *HOWEVER*, the money estimated to be spent on noise mitigation is below the MBTA's standard commitment, and construction of noise barriers is absent from the construction staging sequence. Further, MassDOT should be required to enter into written agreements on its mitigation commitments before a final environmental certificate is issued.

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 one-half to three-quarters of a mile from where service would end.

There is overwhelming community support for the Route 16 station, with more than 2,500 people signing a petition in its favor.

We support the further study of maintenance/storage facility options Mirror H and Scheme L, as they will reduce the environmental impact on the Brickbottom and Inner Belt Neighborhoods. *HOWEVER*, since Scheme L has not been studied to any degree, nor any facility design work undertaken, a Supplemental Environmental Impact Report should be required for the maintenance/storage facility.

DETAILED COMMENTS/SUPPORTING INFORMATION

A. Mystic Valley Parkway Station

The DEIR fails to fully analyze and reduce/mitigate the environmental impacts of the Mystic Valley Parkway terminus station, and little work was performed on the station over the last 20 months of the project. The DEIR states:

“In February of 2008, a series of public workshops were conducted in the neighborhoods to discuss the proposed station areas and to obtain feedback from stakeholders on the various concepts developed. Based on previous work and the feedback obtained at these workshops, the station concepts for Gilman Square and Mystic Valley Parkway / Route 16 were generally accepted by the public and local officials and did not require additional evaluation.” (Appendix B, 4.0).

While the concept of the Mystic Valley Parkway station might have been “generally accepted,” numerous serious issues were raised at the Feb. 6, 2008, station workshop, including objections from commercial property takings from a major property owner in attendance, pedestrian accommodations, traffic volume/safety, and impacts on the Mystic River Reservation.

The DEIR acknowledges the need for additional study of the station later in Appendix B:

4.6 Route 16 / Mystic Valley Parkway Station

This station would extend the Green Line’s service further into Medford. The proposed station location is just south of the railroad bridge over Mystic Valley Parkway. This station has potentially high capital costs for right-of-way and station site acquisition and bridge reconstruction. Due to design constraints, community and City of Medford concerns, further evaluation would be needed to determine the feasibility of this station. (Appendix B, 4.6)

However, while Appendix B contains a detailed analysis of all the other stations (except Gilman Square) with regard to Station Access, Transit Operations, Land Use Compatibility and Project Cost, no such analysis is provided for the Mystic Valley Parkway Station, even though the DEIR states that the Future Full Build Alternative has been “fully evaluated” (page ES-7).

MGNA Alternative Design

The DEIR states that “station locations and track curvatures have been optimized in order to avoid unnecessary property acquisitions,” which it describes as the “primary environmental impacts” of the project.

Clearly, this measure has not been undertaken at the Mystic Valley Parkway Station.

As the alternative station design created by the Medford Green Line Neighborhood Alliance demonstrates, a design that adjust the track curvature and platform orientation is feasible and would eliminate the need to acquire the commercial properties at 200 and 222 Boston Avenue. Further benefits of such a design include:

- Reducing the project cost by at least \$15.4 million (the buildings' current assessed values).
- Preserving nearly \$200,000 in annual property tax revenue for the city of Medford
- Eliminating the need to relocate numerous small businesses and more than 200 employees

We request that MEPA require EOT to conduct further design analysis to create a station at Mystic Valley Parkway that preserves the commercial properties at 200 and 222 Boston Avenue, and also analyzes the adaptive re-use of the U-Haul building at 600 Mystic Valley Parkway, Somerville, as part of the station design.

In addition, further analysis is required at the station regarding:

- Providing a pedestrian connection to the West Medford commuter rail station, which was required in the DEIR but not addressed.
- Re-evaluating potential ridership to include additional bus route access, which is not considered in the DEIR.
- Including Alternative 2 (Mystic Valley Parkway terminus) in Air Quality Analysis Comparison for Project Packages Benefits; Table 5.6-10 only includes Alternative 1 (College Avenue terminus). The Mystic Valley Parkway terminus will result in greater CO₂ reductions (page 5-94) and should be included in the analysis.

It is further recommended that the Full-Build Alternative (Mystic Valley Parkway terminus station) be constructed in one phase because it would:

- Fall in the three-year MEPA and NEPA approval time frame and not require an additional, separate Environmental Impact Report later for the College Avenue to Route 16 phase of the project.
- Eliminate \$50 million in inflationary costs estimated by EOT for construction in the 2016-2020 time frame
- Eliminate the environmental impacts and neighborhood disruptions incurred in a second phase of construction

Other comments:

- The importance of providing Green Line service to the Mystic Valley Parkway station area was underscored by the Traffic Analysis in the DEIR. Of the 26 intersections studied, the Mystic Valley Parkway/Boston Avenue intersection had

the second highest daily traffic volume (28,915), behind only McGrath Highway. This traffic volume, and associated extremely poor level of service at all intersections on Mystic Valley Parkway, contribute to correspondingly poor air quality in this neighborhood, as well as dangerous street surface runoff that carries dangerous materials from motor vehicles directly into the Mystic River.

- Another important factor in favor of the Route 16 station was that the DEIR analysis rated it as one of four stations with “High” potential for Transit Oriented Development. Economic Development is a key component of the Green Line extension project, as well as regional mobility and air quality improvements.
- The Route 16 station also would serve three significant Environmental Justice communities in West Medford and West Somerville that otherwise would not be served by a College Avenue terminus.
- All of the proposed station designs, and in particular the Route 16 station, do not call for adequate bicycle parking. The Route 16 station should have at least four times as many parking spaces as called for in the DEIR (50), particularly since this station will be fed by two new bicycle/pedestrian pathways from east and west.
- All of the proposed stations do not provide for adequate and inviting access for pedestrians and for people with disabilities. Much more design work needs to be done in this area.

B. Medford Hillside not served by College Avenue terminus

The legal requirement in the SIP commitment is for the Green Line to serve “Medford Hillside,” which the DEIR says is “broadly defined as the area from Mystic Valley Parkway to Warren Street” (page 4-18).

This definition is arbitrary and erroneous. The area south of College Avenue is generally known as South Medford, with Warren Street (a k a Harvard Street east of Boston Avenue) being in the center of South Medford.

Dozens of maps submitted to EOT by the MGNA all label “Medford Hillside” as the area northwest of Winthrop Street to Mystic Valley Parkway.

A terminus station at College Avenue does not constitute service to Medford Hillside, much of which is more than one-half mile from the station. Project Manager Kate Fichter admitted as much at an August 2009 meeting of College Avenue neighbors when she described the College Avenue station as “ill-defined as Medford Hillside.”

The DEIR statement that “the extension will pass through the Medford Hillside neighborhood to South Medford” (page 4-25) also is erroneous as applied to

Alternative 1 (College Avenue terminus). The only things that will “pass through” the Medford Hillside neighborhood under this scenario will be additional automobiles destined for the station, adding to already bad traffic congestion and diminishing air quality.

Much of the Medford Hillside population resides more than a half-mile from the College Avenue station. Medford Hillside would only be truly served by the Green Line extension if there were a station at Winthrop Street (which EOT is not recommending) or at Mystic Valley Parkway. Thus, the latter should not only be the Preferred Alternative but also the Proposed Project, to be built in one phase by Dec. 31, 2014, as required by the SIP.

C. College Avenue terminus station impacts

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.

Rather than passing through the station, trains will travel several hundred feet beyond the station in order to reverse direction on tail tracks. This operation will occur every 5 or 10 minutes throughout the service period. In addition, Green Line cars will be staged at the terminus station in the early morning hours prior to the start of service. These impacts are not evaluated in the DEIR.

The traffic impacts of a College Avenue terminus station also are understated and underevaluated. The Alternative 1 Peak Hour Trip Summary by station shows an increase of only 5 pick-up/drop-off passengers (40) at a College Avenue terminus station versus the number of pick-up/drop-off passengers at College Avenue (35) in Alternative 2B (Mystic Valley Parkway terminus).

The actual number of pick-up/drop-off riders is likely to be much higher, the addition of which will have a greater negative impact on the traffic at College Avenue/Boston Avenue (9,000 daily vehicles) than it would have at Mystic Valley Parkway (29,000 daily vehicles).

Furthermore, several intersections in the College Avenue destination area – Boston Avenue/Winthrop Street, Boston Avenue/Harvard (Warren) Street, Main Street at George Street, Mystic Valley Parkway/Winthrop Street – already are operating at an “F” level of service and will only be made worse by additional vehicle traffic destined for a College Avenue terminus station. These additional traffic delays equate to more emissions and diminished air quality.

Also, according to the DEIR, the intersection of Boston Avenue and College Avenue’s level of service is projected to decrease from “E” to “F” with a terminus

station at College Avenue, but would remain at level “E” with a Mystic Valley Parkway terminus station.

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.

D. Mitigation

- The DEIR recommends numerous mitigation measures, but they are often described with caveats such as “to the extent practicable” and “where feasible.” Before construction begins, the EOT should be required to enter into written agreements with each affected city, defining the mitigation obligations and deadlines for fulfillment.
- The construction of noise barriers is not included in the proposed Construction Sequencing (page 3-55). Addition of the noise barriers should be added to the Construction Sequencing and as early in the process as possible, so their benefits are realized during the construction period as well as during the Green Line service operation.
- MBTA policy is to commit at least 2% of project cost to noise mitigation. With an overall cost estimate of \$1 billion, the Green Line noise mitigation commitment should be at least \$20 million; the DEIR estimates only \$15.8 million.
- Additional mitigation measures should be specified including cash payments to affected abutters, and retrofitting the existing commuter rail diesel locomotives with emission-reduction devices.
- The MEPA certificate also should require EOT to enter into written agreements with the cities of Medford, Somerville and Cambridge regarding mitigation commitments to each community.

E. Cost estimates missing

The DEIR is to include a Conceptual Construction and Operating and Maintenance cost estimate for the preferred alternative commensurate with 10% design including contingencies/allowances appropriate in this stage of project advancement. Construction costs should include, at a minimum, the commuter rail and Green Line track, bridges, retaining walls, and other supporting infrastructure, the maintenance and storage facility, all stations and supporting facilities, and any portion of the Community Path included in the project. Operating costs should include changes in Green Line, commuter rail, and bus operating costs.

While the DEIR provides an overall cost estimate, and occasional references to particular cost estimates such as for noise barriers and vibration mitigation, detailed cost estimates are severely lacking. Noticeably absent was any analysis of the Cost Per Hour of User Benefit for each alternative, a crucial measure of the project's viability for federal funding.

F. Other issues

- The project design in the Final Environmental Impact Report should preserve the potential for future stations – between Lechmere and Washington Street / Union Square in Somerville, between College Avenue and Route 16 in Medford, along an extension to Porter Square that could serve both Cambridge and Somerville.
- The DEIR lacks any meaningful analysis of how the Green Line extension will integrate with bus service and broad pedestrian and bicycle access.
- The MEPA certificate should require a public process framework for the remainder of the project that will ensure collaboration with the community and local governments to set project mitigation standards and remedies, to accomplish better station and area designs and minimize environmental impacts.

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, to Route 16 and Union Square, is the perfect example of a project that will fulfill that mission.