

January 6, 2010

Secretary Ian A. Bowles
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Ms. Holly Johnson, EEA No. 13886
100 Cambridge Street, Suite 900
Boston, MA 02114

***Subject: Green Line Extension Project
Cambridge/Somerville/Medford
Draft Environmental Impact Report (DEIR)***

Dear Secretary Bowles:

Please accept this comment letter on the DEIR prepared for the Green Line Extension Project. The City of Medford has led by example in its support of public transportation and transit oriented development as evidenced by the redevelopment of both the Station's Landing and River's Edge projects adjacent to the Wellington Station Orange line. However, due to the lack of detailed technical analyses, the inability of the State's Project Director to deliver promises made during this planning process and the insufficiency of mitigation to ameliorate anticipated negative impacts on both residential and commercial properties and therefore the citizens of the City itself, I am prevented from fully embracing the project as proposed at this time.

Be assured that as Mayor I support the expansion of public transit service in Medford with the goal of improving air quality and creating transit oriented development. The Green Line Extension originally proposed to the Medford Hillside has the potential of providing benefits in addition to improvement in air quality.

When the Romney Administration proposed substituting other projects for the Green Line, I argued for the project to move ahead and proposed that the project terminus be studied in a DEIR to Mystic Valley Parkway.

Not only would this location provide for additional riders, I believe the extension beyond College Avenue could provide additional air quality benefits while providing potential for transit oriented development. My only condition for the final support of this terminus was that the State provide adequate technical information to review the proposal while minimizing property takings and impacts. Unfortunately, despite the information contained in the DEIR, the State has failed to provide the necessary information to make an informed decision on whether it is best to extend the project beyond College Avenue and in what manner. A decision of this magnitude cannot be made by conjecture. Therefore, I urge the State to meet its responsibility to provide the necessary information and to work in partnership with the City so we may resolve these issues and move forward together.

The Mass/DOT's (Proponent's) approach to build the project in two phases with College Avenue functioning as a terminus but not being designed as one, presents difficulties. The uncertainty over how long the proposed College Avenue station will function as an end of the line Green Line station is a major concern for the City of Medford. The lack of information on station design in general is not sufficient. The FEIR should provide alternative designs for the College Avenue station including one that moves the station platform to the south of the bridge. Pedestrian access could still be provided from the north with mechanical and pathways incorporated into the bridge design. Reduction of platform length in addition to a shift in the southerly direction should provide some measure of relief to residents of Burget, Hume and Sunset Avenues as compared to the proposed location.

While I am not in support of the creation of all day parking for people from the greater Boston region, I am concerned about the ability of the stations to accommodate drop off and pick up, and to provide safe and efficient access by pedestrians and people with mobility or other physical limitations, bicyclists and people arriving by bus. If assumptions regarding how people arrive at stations are inaccurate, the functioning of the already constricted Boston and College Avenue intersection could prove debilitating in terms of traffic operations, safety and parking impact on adjacent neighborhoods. The FEIR must justify the DEIR's assumptions regarding drop off and pick up rates.

Pedestrian as well as vehicular mitigation improvements must be considered. The study identifies unregulated parking opportunities near the proposed stations. Use of spaces may be abused by transit riders adversely affecting neighborhoods. A parking management plan should be prepared by Mass/ DOT in cooperation with the City and submitted as part of the FEIR to ensure neighborhoods are not impacted as a result of demand for parking.

It is unclear as to how much construction will occur at night. The FEIR needs to state clearly what the Proponent's intended schedule of construction is providing a breakdown of am versus pm hours. Specifics on when, where, and for how long nighttime and/or weekend construction will occur should be presented. Based on that presentation, mitigation must be proposed. Also regarding construction, a noise analysis during construction based on typical equipment to be utilized should be presented in the FEIR. The DEIR does not sufficiently analyze impacts and mitigation within Medford.

In regard to stormwater, an operation and maintenance program using best management practices must be established. Additionally, proper infrastructure must be required to avert flooding. More information is required on utilities and proposed mitigation.

The FEIR must examine the extension from College Avenue to Mystic Valley Parkway to the same degree as is required in the Secretary's Certificate for all portions of the project. The DEIR quite simply does not. This fact, along with the disconnect between what the Proponent's representatives say publicly versus what has been presented and committed to in this report has created the fundamental dilemma of how to provide unwavering support for this project while ensuring that the best interest of the citizens is served.

In general, the DEIR does not adequately address all impact issues for the extension beyond College Avenue. The Proponent has presented this extension as both its preferred alternative and its "worst case scenario". The City's primary issue with the extension beyond College Avenue has been with the Proponent presenting a plan that minimizes noise, vibration, air quality, parking and the taking of private property including successful commercial properties that generate tax revenues and employment. The Proponent's representatives have stated that such a plan exists but have not shown it.

They stated they would complete the necessary field survey to identify actual land acquisitions that can be shown publicly in a format that is understandable by all. That survey has not been done resulting in schematics that look good on paper but have little usefulness in reality and do not allow the public to determine if and how much of their property will be affected. The Proponent has also failed to complete its required land use study as it has promised and as is required in the Secretary's Certificate. This study along with the identification of station locations will provide the basis from which the City will conduct more detailed land use planning. This information has been requested by the City on many repeatedly but it has not been forthcoming.

Key department heads within the City shall submit comments under separate cover. Additionally, the City's consultant has provided comments on the topics of air quality, noise and vibration, constructability, wastewater, transportation, stormwater and visual impacts. This technical review is attached.

It has been the vision of this administration to support the preservation of residential neighborhoods in the Hillside while identifying opportunities for the expansion of our commercial tax base and the creation of jobs. The Walkling Court housing development could benefit from a public/private partnership to improve living conditions for our seniors while providing a mix of uses. Similarly, the redevelopment of the Whole Food's property should be evaluated to explore mixed use transit oriented opportunities.

If the Proponent would fulfill both its commitment to work with us, and its obligation to provide adequate and transparent information, the construction of this project from Lechmere Station to Mystic Valley Parkway could be achieved in a way that not only improves public transit but improves the quality of life in our neighborhoods.

While the extension of the Green Line through Medford may well bring with it many benefits, the DEIR does not provide me with sufficient information on issues critical to the quality of life of Medford resident to support the project without reservation at this time. I appreciate your consideration of these comments and look forward to the FEIR addressing the issues raised.

Very truly yours,

Michael J. McGlynn
Mayor

Attachment

cc: Medford City Council
Congressman Edward Markey
Senator Patricia Jehlen
Representative Paul Donato
Representative Sean Garballey
Representative Carl M. Sciortino, Jr.
Mary Beth Mello, Deputy Regional Administrator, FTA
NEPA Reviewer, USDOT
Marc Draisen, Executive Director, MAPC
Barbara Rubel, Community Relations Director, Tufts University
Monica Lamboy, Director, Office of Strategic Planning and Comm. Development
Rita Donnelly, Representative Green Line Advisory Committee
Ken Krause, Representative Green Line Advisory Committee
Dr. William Wood, Representative Green Line Advisory Committee
Noah Chesnin, Conservation Law Foundation