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December 22, 2009

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

Dear Secretary Bowles:

Please accept these comments on behalf of the City of Medford's Office of Community Development. While the Draft Environmental Impact Report/Environmental Assessment provides useful diagrams and maps, the substance of the report is lacking the detail necessary to be reviewed as a final document. The project is proposed to be constructed in two separate phases and should be reviewed accordingly. The DEIR does not provide sufficient detail regarding the proposed station location, access and impacts at the preferred terminus at Boston Avenue and Mystic Valley Parkway nor does it recognize the fact that the station location at Boston Avenue and College Avenue will operate and function as a terminus until or unless the Mystic Valley Parkway station is constructed. A Final EIR should be prepared with College Avenue as a proposed terminus. A Draft EIR should be prepared for the extension from College Avenue to Mystic Valley Parkway. I appreciate your consideration of the comments that follow.

1. Land Use, Social and Environmental Resources

The DEIR did not sufficiently identify impacts on properties within the project area, determine changes in land use, and describe how it will contribute to gentrification of existing residents and businesses. Alternative designs of the extension to Mystic Valley Parkway should have been provided to minimize the taking of private properties which will create significant job and tax revenue loss.

While the creation of mixed use high density transit oriented development may be desired in underutilized areas adjacent to stations in Somerville, whether high density development is feasible in the areas around Ball Square, College Avenue and Mystic Valley Parkway within Medford warrants further study.

The DEIR failed to present the corridor planning study as required and provides little useful information to evaluate social and economic impacts within Medford. The Secretary should require MassDOT to conduct a full corridor study prior to the submission of the FEIR. It was never the City of Medford's understanding that an earmark of funding for the City to do land use planning alleviated the EOT from meeting its obligation to do so as part of the DEIR.

Direct effects of land acquisition are caused by the project. The extension to Medford Hillside will result in the full acquisition of 662, 664, and 665 Broadway for the construction of the Ball Square Station. Portions of 474, 590 and 179 Boston Avenue will be taken for laying of track (Table 5.2-1). These takings are within the street right of way.

The proposed extension to Mystic Valley Parkway/Route 16 will add twelve (12) takings including a partial taking of 590 Boston Avenue (Gas Station lot), 474 Boston Avenue (lot of Tufts Student offices/coffee shop), 220 Boston Avenue (office) and 200 Boston Avenue (R & D). There are additional street right of way takings along Boston and College Avenue and a small taking of land from a house lot on Piggott Road and from a lot on 200R Boston Avenue.

The anticipated tax effects from the construction of Alternative I (Extension to College Avenue) is \$15,777 with no jobs lost. The Extension to Mystic Valley Parkway is anticipated to result in a loss of \$182,886 in tax revenue. Job loss is as follows: 600 Mystic Valley Parkway (13), 222 Boston Avenue (30) 200 Boston Avenue (194). The report assigns the loss of five (5) jobs at 662/664 to Somerville.

The report states that the loss of 224 jobs in Medford as a result of constructing the MVP/Rte 16 station does "not represent a significant fraction of jobs in these three cities" and later the report states the jobs at stake "represent at most a minimal economic impact". This conclusion is self serving and does not provide any recognition of the importance of retaining jobs in the current economy. Of more importance is the effect of job loss on individuals and their families and businesses in Medford.

The FEIR should contain an analysis of the true cost of job loss and the cost of job creation. The assertion is made that these jobs will be relocated locally with no substantiation of the claim.

2. Environmental Justice

The report does not adequately address impacts to the Walking Court elderly housing development. Access by the elderly and the disabled to public transit and to area businesses and services during construction must be more fully evaluated. The shift of the existing commuter rail tracks to the east should be more fully evaluated for health impacts to special populations.

Meetings should be conducted with special populations that are less likely to attend a large public hearing in an adjacent city. These should be required prior to the acceptance of any environmental review document proposing the extension to Mystic Valley Parkway.

3. Air Quality

The report does not contain specific information that measures the current versus full-build analysis on the residential neighborhoods between College Avenue and Mystic Valley Parkway that could be adversely affected by the shift of existing commuter rail tracks with diesel run cars, to the east.

4. Noise and Vibration

Noise impacts due to the introduction of the more frequently run Green Line trains versus existing operations, as well as the shift of the existing commuter rail lines, will increase noise levels. Moving the commuter rail lines to the east will adversely impact residents. Additionally, the close proximity of homes on Allston Street and Piggott Road will be especially burdened. Homes and businesses close to bridges that must be reconstructed will also be adversely affected during construction. Nighttime construction should not be allowed. Noise barriers should be installed the length of the right of way in Medford. In addition to and not in place of barriers, sound insulation techniques should be employed at homes as well as businesses along the right of way. The report identifies that the extension to MVP/Rte.16 will add an additional 50 moderate and 24 severe residential noise impacts. Given that the majority of homes in Medford are older, opening windows will lessen the value of sound insulation techniques resulting in unacceptable noise levels.

Vibration impacts will similarly impact properties and are expected to be especially adverse at locations near bridges where there will be pile driving. Compacting will also result in adverse noise level. The DEIR identifies over ninety (90) homes and three (3) institutional buildings that will be adversely affected with no mitigation proposed during construction.

The proposal to construct a tunnel from College Avenue to Mystic Valley Parkway should be further evaluated for its benefits to air quality and noise.

5. Visual

The report inadequately addresses visual impacts from the loss of vegetation in or near people's yards, construction of noise barriers and station designs. Additional information including more detailed designs and alternative designs are necessary along with adequate public involvement to reduce the proposed impacts to the visual environment.

The final approval of the project should prohibit the MBTA from installing or leasing property to construct billboards or cellular towers along the right of way in Medford.

6. Historic Resources

The proposed extension to MVP/Rte 16 should include an alternative analysis that includes reconstructing the rail bridge crossing at Mystic Valley Parkway and moving the station platform in that direction. This may enable less impact to commercial properties in Medford and allow for better access by buses, vehicles, pedestrians and bicyclists. Changes should be done with respect to the character of the historic structures eligible for National Register designation which should be inventoried as well as the one historic archeological site, a portion of the Middlesex Canal. Project representatives should meet with the local Historic Commission during the next stage of design.

7. Hazardous Materials

The project involves construction in several areas with known environmental issues. The removal of existing rail lines treated with chemicals requires a comprehensive approach along with coordination with state and local officials to insure proper remediation. Area residents should be informed as to the status of identification and remediation of sites and protected during remediation. Stockpiling of removed contaminated rail ties should not be allowed. Best management practices should be used when addressing removal of hazardous materials. A project representative should be available to address concerns raised by neighbors, businesses and governmental officials relative to all hazardous material issues including dust control. The individual's telephone number should be made available to the public for quick response.

8. Traffic

The No-Build Alternative assumes the Urban Ring transit service is operational. The peak hour estimates of pedestrians and bicycles at Ball Square is 670 and at College Avenue is 760 with an additional 30 and 40 persons respectively being picked up or dropped off. The report does not adequately account for the high estimates of walkers and low estimates of pick up/drop off.

The report states the intersection level of services would be improved by signal timing and phasing at Main Street/High Street/Salem/Forest and Riverside. The report projects the morning peak hour would improve from F to E and the evening peak hour from D to C. Additionally, the report asserts an improvement at Mystic Valley Parkway/Route 16 at Boston Avenue from F to E in the AM peak hour but continues to operate in a failed condition during the evening peak hour. Level of service degradation would occur at Boston Avenue/Winthrop Street from E to F in the evening peak hour. Boston Avenue/College Avenue would degrade from E to F in the AM peak hour.

For a public transit project of this magnitude and expense it is unacceptable for the local roadway network to not have a discernable improvement in operations. The Proponent should be required to make improvements to all intersections to a level of Service of D or better. Local communities cannot be expected to bear the burden of correcting the unacceptable roadway operations. The Proponent should be required to provide additional information on the intersections of Harvard Street with Willis Avenue and Harvard Street and Mystic Avenue. Truck trips, especially with the impact of the loss of freight rail must be addressed along with the identification of acceptable trucking routes.

The following signals should be reconstructed as required mitigation of the project and synchronized with lighting along the corridor.

1. Mystic Avenue/Harvard Street
2. Harvard Street/Willis Avenue
3. Harvard Street/Boston Avenue
4. Boston Avenue at Winthrop Street
5. Boston Avenue at North Street
6. Boston Avenue at MVP
7. Boston Avenue at High Street
8. College Avenue at George Street
9. George Street at Main Street
10. Main Street at South Street
11. Main Street at MVP
12. Main Street at High Street, Forest and Salem Streets

The proponent was requested by this Office to evaluate the feasibility of reducing the five-legged intersection at Boston and College Avenue by prohibiting north bound traffic from the Somerville direction on College Avenue. This traffic change would also have allowed a much greater area for pedestrians and a possible station entry point on College Avenue itself. This concept should be explored in the FEIR.

In order to insure maximum pedestrian access the proponent should be required to fund the design of a DCR path linking the terminus to the Condon Shell pathway system. Pedestrian access from West Medford must be improved.

9. Parking

The Secretary's Certificate required the development of the traffic scope of work with the local municipality. I do not recall a meeting in regard to this matter. Furthermore, the DEIR was to contain useful information regarding approaches to issues such as traffic enforcement. The FEIR should contained a detailed parking and enforcement plan prepared in consultation with the City to minimize parking impacts in local residential and businesses areas.

10. Construction Impacts

Traffic related construction impacts including temporary bridge closures, restrictions, traffic detours, and loss of parking during construction were highlighted as issues with no plan proposed to address them. The Proponent should be required to submit a more detailed assessment of these impacts and a plan to address construction impacts within the FEIR.

In summary, I respectfully request that given the need to provide a more comprehensive analysis and information, the Proponent should be required to file a Final Environmental Impact Report for Alternative 1. Additionally, I request that the Secretary determine that insufficient information has been provided for the project to be reviewed past College Avenue and that a separate filing of a Draft EIR be required for that portion of the project.

Very truly yours,



Lauren DiLorenzo
Director

Postscript

To insure that Medford residents were well represented during this environmental review process, Mayor McGlynn asked that I coordinate the involvement of the various department heads organizing briefings on the project and facilitating their review of these voluminous documents. Several of these individuals will submit letters to you identifying concerns or issues that are related to their particular area of expertise.

However, I would like to highlight the letter of one individual in particular, my colleague Brian Boudreau, Superintendent of Wires. Brian passed away suddenly and unexpectedly December 5, 2009. He held his position with the City for less than one year. He took his responsibility to represent the residents of Medford in this process seriously, reprioritizing his daily activities to learn about this complex project so that he could identify any potential concerns. His memorandum to Mayor McGlynn is attached.

LD/ab

Attachment

cc: Michael J. McGlynn, Mayor
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



BRIAN J. BOUDREAU
Superintendent of Wires

City of Medford

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Memorandum to: Mayor Michael J. McGlynn

From: Brian Boudreau *BB*
Superintendent of Wires

Re: Proposed Green Line Extension Project

Date: November 9, 2009

After reviewing the Green Line Extension Project Draft Environmental Impact Report, below I have listed my concerns and questions.

- Additional information is needed regarding the power substation location, design and any adverse affects on the immediate surroundings to businesses and/or residents.
- With regards to bridge upgrades, I will need to see more information on how they plan to relocate and upgrade utilities in and around the 4 Medford bridges intended to be reconstructed.
- Who will own, maintain, operate and pay the electric bills for the suggested pedestrian/traffic lights?
- A review of the Boston Avenue entrance to the Mystic Valley Parkway/Rt. 16 Station needs to be conducted, I feel a traffic light at this location is necessary.
- I would like to review the electrical/fire alarm design layout for the proposed College Avenue and Rt. 16 stations as well as the power substation.
- Along the new stretch of railway will safety lighting be installed to help prevent injury and/or vandalism to the passengers, trains and the track?