



December 12, 2017

Secretary of Energy and Environmental Affairs  
Executive Office of Energy and Environmental Affairs (EEA)  
MEPA Office  
Attn: Erin Flaherty, MEPA Analyst  
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Dear Ms. Flaherty:

I am writing to you on behalf of the Mystic River Watershed Association (“MyRWA”) regarding the Notice of Project Change (“NPC”) submitted to the Massachusetts Department of Transportation (MassDOT) (the “Proponent”) in October 2017 for the Green Line Extension -- College Avenue to Mystic Valley Parkway in Medford, Massachusetts (“GLX”).

MyRWA is a 501(c)(3) nonprofit organization dedicated to the preservation and enhancement of the Mystic River, its tributaries and watershed lands for the benefit of present and future generations. MyRWA seeks to protect and restore clean water and the natural environment and to promote responsible stewardship of our natural resources. In addition, MyRWA works to improve public access to water bodies and shorelines throughout the watershed, and especially for environmental justice populations whose recreational opportunities have been limited by the concentration of industrial and commercial development along the edges of the river.

We support the Proponent in its exploration of a one-mile extension of the Green Line from College Avenue to Mystic Valley Parkway in Medford. The purpose of this NPC is to initiate an MEPA review of the GLX proposal. Extending the Green Line terminus to the Mystic Valley Parkway is anticipated to have positive environmental and environmental justice benefits. Confirming (or refuting) the extent of those benefits against these new mitigation factors will inform how to progress on the project.

In particular, MyRWA advocates that the environmental studies examine water quality and public access to watershed resources. In addition to bicycle access to the region, the Mystic Greenways provides pedestrian access to miles of public open spaces along the Mystic River, its tributaries, and connector paths and parks. The GLX would be a key access point for all communities, including environmental justice communities, in the north- to northwest Boston area to connect with and enjoy the open space network.

We offer specific comments about evaluating water quality and access issues against this NPC.

#### **Clean Water**

- The NPC indicates the extension project has “no impact” on wetlands or waterways. Yet, with the location of an electrical station yet to be determined, the mapped terminal project is

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located within 100 feet of the Mystic River. We recommend re-evaluating the potential impacts of constructing and running the station, and also setting guidelines for the electrical station placement, in terms of its proximity to the Mystic River.

- The NPC reports the station design “will result in small increases in impervious surfaces.” We recommend exploring solutions to mitigate these increases by reducing impervious surfaces and/or designing offsets to mitigate the anticipated increase.
- Extending the Green Line to the Mystic Valley Parkway has the potential to reduce automobile vehicle miles travelled around the project site. Updating the previous (2010) traffic study is appropriate, especially the expected reduction in auto emission pollutants washed from the roadways and carried into the river by stormwater.
- We applaud the intent to explore how air quality improvements will also benefit water bodies and surface waters.
- We also suggest miles travelled or automobile idle time may be impacted along Route 16, from Alewife to Route 93, as commuters take advantage of a local rail station rather than use cars or buses to travel to Alewife or Wellington Stations. Reducing automotive travel along the stretch of Route 16 that closely follows the Mystic River or one of its tributaries, Alewife Brook, may contribute to the environmental benefit of the project.

#### **Public Access and Public Safety**

- We applaud the inclusion of the Mystic Greenways project in the NPC. Supporting bicyclists who will be using the completed Greenway system is expected to contribute to reduced automobile miles in the area, and also serve those in the community who rely on bicycles for primary or commuting transportation. We are concerned about bicyclist safety, in particular at the intersection of Mystic Valley Parkway and Boston Avenue. We recommend a bicycle-accessible bridge to cross over Mystic Valley Parkway, lighting installed on the bike path, and studies done to identify surface streets likely to experience increased bicycle traffic to and from the station.
- As stated above, the GLX would be a key access point for all communities, including environmental justice communities, in the north- to northwest Boston area to connect with and enjoy the Mystic Greenways open space network.
- Neighborhood access. In addition to a bicycle-accessible bridge to cross over Mystic Valley Parkway, we recommend exploring the benefits of a pedestrian bridge (as planned for College Avenue) along the footprint of the train line as it crosses Mystic Valley Parkway to serve West Medford. A bridge would protect pedestrians or cyclists from crossing Mystic Valley Parkway on foot, would offer a corridor to West Medford (via Canal Street), and perhaps offer an alternative “kiss and ride” point on the west side of the river.
- The project plan focuses on non-motorized access to the station (e.g., pedestrian and bike paths), with a review of commuter bus impacts to come at a later point. The plan should also consider an option for bus drop-off and pick-up within the station or at points of access near, but not in, the station (see above in re: exploring options west of Mystic Valley Parkway). Also consider drop-off and pick-up on the Whole Foods side of the project. This consideration will be important should an opportunity to redesign bus routes to extend into the suburbs and terminate at GLX stations arise. Retiring bus routes made obsolete by GLX, and designing new routes (or enhancing existing routes) to support commuter movement would likely again reduce automobile miles travelled in car-centric neighborhoods of West Medford and East Arlington.



- The NPC increases the number of bicycle parking from 120 spaces (from 50) spaces. We suggest evaluating whether 120 spaces will be adequate to the anticipated ridership. We suggest comparing bicycle parking at MBTA stations well-connected to mature bicycle paths (such as Alewife Station - the Minuteman Bikeway) to assess if 120 spaces represents appropriate capacity against the ridership expected at the station.

Additionally, we'd like to emphasize the importance of items previously included in the GLX Sustainability Plan:

- Water and water management are major issues for the GLX. Much of the extension will be built below grade level in a "cut" where commuter rail lines currently run and flooding sometimes is a problem due to antiquated draining systems. Water management concern is heightened due to the anticipated impacts of climate change and the likelihood of more severe and more frequent rain events.
- To help prevent flooding, each GLX station platform will have a temporary rain storage area underneath it to hold stormwater during a rain event.
- To reduce the amount of stormwater runoff, a green roof is being considered for the Green Line maintenance facility, and the MBTA also is exploring the feasibility of installing a "blue roof" that would allow rainwater to be captured for use washing Green Line vehicles. These elements should be considered if any buildings are constructed or modified at Mystic Valley Parkway.
- Require the use of low-toxic, sustainable materials in all elements of the design.
- Design extra protection from catastrophic rain events/flooding for the electrical power substation to be sited near the Mystic Valley Parkway station.
- Use hardy, native plants in landscaping.
- Utilize the Envision system guidelines which rate and certify public works projects for sustainability (similar to LEED for private development).

As an interested stakeholder, we encourage the next steps defined in the NPC. Thank you for the opportunity to comment on the recently proposed changes to this important project.

Sincerely yours,

Patrick Herron, Deputy Director