From:	Fred Berman
To:	jerome.grafe@state.ma.us; christine.kirby@state.ma.us; David.mohler@state.ma.us; Katherine.fichter@dot.state.ma.us; publicinformation@ctps.org
Cc:	cooke.donald@epa.gov; arnold.anne@epa.gov; monahan.rosemary@epa.gov; pamela.stephenson@dot.gov; michael.chong@dot.gov; william.gordon@dot.gov; "Ellin Reisner"; fred.berman@rcn.com; "Lori Segall"
Subject:	Green Line/Community Path Extension: SIP transit commitments, Boston MPO 2012-15 TIP, Boston MPO LRTP
Date:	Tuesday, September 13, 2011 6:10:29 AM

TO: Mr. Jerome Grafe, Mass Department of Environmental Protection, jerome.grafe@state.ma.us
Ms. Christine Kirby, Mass Department of Environmental Protection, christine.kirby@state.ma.us
Mr. David Mohler, Chair, Boston MPO Planning & Programming Committee, David.mohler@state.ma.us
Ms. Katherine Fichter, MassDOT Office of Transportation Planning, Katherine.fichter@dot.state.ma.us
Boston MPO Staff at publicinformation@ctps.org

FR: Fred Berman and Lori Segall 25 Cherry Street Somerville, MA 02144 fredlori@rcn.com

CC: Ms. Anne Arnold, Manager, EPA Region 1 Air Quality Planning Unit, arnold.anne@epa.gov
Mr. Donald Cooke, Conformity and mobile monitoring, EPA Region 1 Air Quality, cooke.donald@epa.gov
Ms. Rosemary Monahan, EPA Region 1 Smart Growth Coordinator, monahan.rosemary@epa.gov
Ms. Pamela Stephenson, MA Division Administrator, Federal Highway, pamela.stephenson@dot.gov
Mr. Michael Chong, Federal Highway Planning and Environ. Program Manager, michael.chong@dot.gov
Ms. Mary Beth Mello, Regional Director, Federal Transit Region 1, william.gordon@dot.gov

DA: September 13, 2011

RE: Green Line Extension, Community Path Extension

Dear Transportation Leaders,

We are writing in strong **opposition** to MassDOT's request to delay the Green Line opening to 2018-2020, and in similarly strong **opposition** to proposals to delay the Green Line extension that are embodied in the 2012-2015 Transportation Improvement Program (TIP) and Long Range Transportation Plan (LRTP).

We urge the Mass Department of Environmental Protection (DEP) to **reject MassDOT's request to delay the Green Line opening to 2018-2020**, and urge the Boston Region Metropolitan Planning Organization (MPO) to **reject the same delays that are contained within the 2012-2015 Transportation Improvement Program (TIP) and Long Range Transportation Plan (LRTP)**.

This letter reiterates points that we have made in previous testimony -- at hearings, community meetings, and in writing -- and points that have been repeatedly made in correspondence/testimony from our elected officials, from STEP and other advocates for the Green Line Extension and the Community Path Extension, and from ordinary residents who thought someone was listening.

We are outraged that after so much planning effort, such strong and prolonged demonstration of public support, despite such compelling reasons for going ahead, and after such a long delay in follow-through on legally binding SIP commitments, the Green Line extension is being snatched away, once again.

If the State's failure to deliver on the Green Line Extension were a case of chronically unpaid alimony

and child support, the negligent parent would have been thrown in jail long ago.

The State's failure to follow through on its legally binding commitment to mitigate the adverse impacts of the Big Dig is nothing less than abject disregard for the law, the word of the Courts, and the oft-repeated commitments of State officials all the way up to the Governor.

After thousands of people hours of public participation in the planning process, Somerville residents are being given the finger, and told to "go home, suckers" and wait another 8-10 years.

We are being told to have faith in a process that will have lost any and all of its credibility, after years of apparently empty promises. At the same time that our leaders talk about accountability and transparency, we are offered tangible evidence that there is neither.

This is not about feeling misused and gullible like Charlie Brown as the football is pulled out from under us for the umpteenth time; this is about a future of significantly more heart and lung disease, of lost opportunities for economic development, of being relegated to the transportation backwaters of metro Boston, of having our city severed by a pollutant-spewing concrete monstrosity with no meaningful hope of remediation or compensation.

The DEP and MPO have this one opportunity to turn that around. We hope you will do the right thing, and restore plans to bring the Green Line Extension (and Community Path Extension) to fruition by 2015.

As per the STEP comments:

The original legal agreement in 1990 to extend the Green Line was revised in 2000 for planned completion in **2011**. Then it was delayed to **2014** in revisions to the State Implementation Plan (SIP), legal obligations under the Clean Air Act. Then last year MassDOT said the Green Line Extension (GLX) would not open until **2015**. Now, they have announced even more delays, to **2018 to 2020**!

SUSTAINABILITY. It is important to **remember that the Green Line Extension is a great, sustainable transportation project**. It's light rail that will provides clean transit to the city most health-burdened by highway and diesel commuter rail pollution. 85% of Somerville residents will have access to rail and many of our neighbors in East Cambridge, Medford and Arlington will have access to new light rail. It will also integrate with the Community Path, providing convenient access to Green Line stations and completing a bike and pedestrian route from Bedford to downtown Boston. The Green Line Extension fully embodies the principles espoused by GreenDOT*.

It is no wonder the Green Line is overwhelmingly supported in Somerville and surrounding communities.

THE GREEN LINE IS A LEGAL OBLIGATION UNDER THE CLEAN AIR ACT. It has been the state's single largest Transportation Control Measure (TCM) obligation under the State Implementation Plan (SIP) for twenty years. Thus, it is a binding legal obligation under the Clean Air Act. Federal Transportation Conformity Regulations require that SIP TCMs like the Green Line Extension must be given funding and completion priority by the region and state.

Meeting this legal obligation requires the Boston MPO to show realistic funding sources and timely completion of the Green Line Extension in both the 2012 – 2015 Transportation Improvement Program (TIP) and the Long Range Transportation Plan (LRTP). **Currently the TIP shows less than 50% of the money and less than 50% of the Green Line Extension being completed by the legal deadline of 2014.**

The Draft 2012 – 2015 TIP and the Draft LRTP "Paths to a Sustainable Region" fail to meet both the "fiscal constraint" requirement for full funding and the "environmental" requirement for timely completion of the SIP TCMs. **And, beyond the binding legal obligations, MassDOT and the Commonwealth**

have failed over and over again to meet promised deadlines given to the Green Line Extension communities. Citizens deserve greater respect.

FUNDING, TIMING and TRANSPARENCY. The Green Line Extension communities have repeatedly welcomed project staff from MassDOT, the MBTA and their consultants. Cooperation, rapport and enthusiasm have generally been high on both sides whenever people have rolled up their sleeves to tackle project details. However, MassDOT has too often been coy and tactical, squirming at major steps with regard to securing real funding for the project and making reasonable time commitments.

STATE IMPLEMENTATION PLAN:

- *MA DOT states that securing federal "New Starts" funding for the Green Line is risky because of the MBTA financial condition, but MA DOT has not demonstrated it has a funding plan and design and construction schedule to meet the SIP requirements using only state funding – which has been agreed to by the Commonwealth in the SIP agreement.*
- Monthly SIP reports as late as May 2011 committed to completing the Green Line Extension at the end of 2015, with no suggestion of further possible delays. This reflects a lack of transparency and seriousness in meeting the SIP requirements.
- MassDOT's assertion that land acquisition is a primary factor in the latest delay is not acceptable. Commuter rail track could be moved and track could be laid while waiting to acquire land for the Ball Square and Union Square Stations. Using Greenbush Line land acquisition delays as a lesson learned for the GLX is not a valid comparison because the land required was for right of way. This is not the case for the GLX. GLX land acquisition is for station locations and the maintenance facility (not included in the SIP agreement)
- The suggested phasing scenario proposed for constructing the GLX should only be permitted if the State is legally bound to complete of the full GLX to Route 16 by 2018.

IMPACT OF DELAY ON HEALTH

The Green Line Extension is supposed to mitigate the health effects of vehicle pollution from 1-93 and regional highway traffic as well as regional ozone. Delaying completion of the project without mitigation of the pollution will continue to negatively affect the health of Somerville and regional residents. Somerville has the greatest daily exposure to commuter traffic and diesel rail pollution in the state from 250,000 vehicles on I-93, Mystic Avenue (38) and McGrath Highway (28). We also breathe fumes from 200 daily diesel commuter and freight trains that cut through the city but (fortunately) do not stop.

People who live in the most transportation-polluted 10% of a large urban region may have:

20% higher overall mortality rates; 50% higher lung cancer mortalities

50% higher childhood asthma rates 50% higher heart attack mortalities

IMPACT OF DELAY ON REGIONAL/STATEWIDE ECONOMICS:

- Could jeopardize the State's federal transportation funding, a loss of $650 million per year.
- Would significantly increase the cost of the GLX project and needlessly cost taxpayers statewide $200 million or more, plus the costs of required air quality mitigation to offset the delay.
- Will deny a key regional transit link for employers, universities, research centers and residents.
- Will result in significant loss of sales and income tax revenues to the Commonwealth because it misses the opportunity to create construction and other jobs when we really need them.
- Will cause us to miss the benefits seen by other regions in the country such as Salt Lake City, Utah and Dallas, Texas that have recently built light rail on time and sometimes under budget.

IMPACT OF DELAY ON THE COMMUNITY PATH

- Delaying GLX also delays the Community Path. The 2.3 mile Community Path extension will connect the regional Minuteman Path network to Boston and to the Charles River network.

TRANSPARENCY/CREDIBILITY:

- Governor Patrick committed to build the Green Line Extension during his term in office.
- Governor Patrick and the Lieutenant Governor must honor this commitment.

- The Green Line Extension was legally mandated in 1990. Thirty years is an unacceptable delay.
- The Green Line Extension has never been given top priority, even though it is a legally obligated Transportation Control Measure specified in the State Implementation Plan (SIP).
- The state must pursue full bond funding of GLX to satisfy Federal Transportation Conformity. Why is GLX not being moved as aggressively as the Fast14 Bridge replacement project? With all the supposed brain power of our region, why can't we get a 7 station transit extension built in a timely, cost-effective way? We have just recently built a massive new highway bridge on the Cape and we are widening our highways with a multi-year Route 128 mega-project, but we just can't seem to get a shovel in the ground on time for a sustainable urban light rail project.

***GreenDOT** http://transportation.blog.state.ma.us/blog/2010/06/massdot-launches-greendot.html*
"GreenDOT, a comprehensive environmental responsibility and sustainability initiative that will make MassDOT a national leader in "greening" the state transportation system. GreenDOT will be driven by three primary goals: reduce greenhouse gas (GHG) emissions; promote the healthy transportation options of walking, bicycling, and public transit; and support for smart growth development."

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