



**Friends of the Community Path**  
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September 13, 2011

To:

Mr. Jerome Grafe, Mass Department of Environmental Protection  
Ms. Christine Kirby, Mass Department of Environmental Protection  
Mr. David Mohler, Chair, Boston MPO Planning & Programming Committee  
The Boston MPO Staff

Re: Community Path, Green Line Extension Delay – Please fully enforce the SIP Air Quality requirements and Transportation Conformity Measures in the Boston MPO 2012 – 2015 TIP and LRTP

To Mr. Jerome Grafe, Ms. Christine Kirby, Mr. David Mohler, and the Boston MPO Staff:

We are writing on behalf of the Friends of the Community Path, a community group of almost a 1000 members that was formed ten years ago. We are writing here for a number of reasons, first to express our thanks and support for the 2012 Transportation Improvement Program (TIP) funding of the Cedar-to-Lowell Community Path section.

We are also writing to emphatically protest the State's attempt to further delay the Green Line Extension (GLX), and we urge that the project be put back on schedule as legally required. As such, we urge Federal and State government entities to enforce the legal and environmental obligations (Federal Transportation Conformity Measures and SIP air quality) of the GLX project to their full extent. The Green Line extension is a legal obligation under the Clean Air Act, and the project should not be allowed to be delayed further. Full funding of the project and any interim replacements must be identified in the Boston MPO 2012-2015 TIP and in the Long Range Transportation Plan (LRTP).

**Community Path: Lowell to Cedar Street**

We wish to thank the MPO for the draft programmed 2012 TIP funds to be used for the construction of the next quarter-mile section of the Community Path from Cedar Street to Lowell Street at the location of the Lowell Street GLX station. We request that the final 2012-2015 TIP be approved with this funding intact. There were (at least) 138 letters written to the MPO in March to support funding this section of the Community Path.

## **Community Path and the Green Line extensions**

There is ubiquitous regional support to extend the Community Path all the way to Lechmere and North Point along with the Green Line extension project. We are attaching here over 200 letters supporting the simultaneous construction of these projects. These letters were written just two weeks prior to the State's August 1<sup>st</sup> announcement of its intention for further GLX delay. However, it is clear from these letters that there is vast public support not only for the Community Path extension, but also for the timely construction of the Green Line extension.

Delaying GLX project also delays the Community Path, since the two projects need to be designed and built together. This proposed Community Path connector from Lowell Street (Somerville) to Lechmere/NorthPoint (East Cambridge) cannot be designed and built without sharing infrastructure, right-of-way, and heavy construction with the Green Line extension.

Full funding of the Community Path should also be programmed in the 2012-2015 TIP and LRTP along with the GLX. The GLX and Community Path are wonderful sustainable transportation projects that will help more people get around with fewer car trips, curb greenhouse gases, and provide needed regional economic development opportunities.

The Community Path will connect the walking and biking neighborhoods of Somerville and Cambridge to four of the new Green Line Extension stations, bringing riders to the MBTA system in the most cost-effective manner. Harnessing the synergy of these transportation modes with mass transit will vastly increase Green Line extension ridership at a low cost per rider and make the GLX a truly multi-modal project.

This Path will create a regional network of path connectivity of almost 50 miles of continuous path to 11 Boston MPO cities and towns. The 2.3-mile Community Path connector project is the missing link (as shown in the attached regional map) will link the Minuteman Bikeway network and Charles River path network, producing a zero-emissions active transportation network.

The City of Somerville is not planning to apply for a TIGER III grant for the Community Path as they did last year (i.e., TIGER II). The TIGER application requires a match, which was to be the shared infrastructure construction (bridges, retaining walls, etc.) for the GLX from MassDOT. With the pending GLX delay, MassDOT cannot make this shared infrastructure construction commitment (estimated value of ~\$10 Million) in good faith now. Thus, this multi-million grant opportunity for the Community Path is sadly lost at this time due to the pending GLX delay.

## **Getting the Green Line Back on Track**

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 announced that the Green Line Extension (GLX) would not open until 2015. Now, they have announced even more delays, to 2018 to 2020. While the reasons given are claimed to be out of MassDOT's control, the delays can be alleviated by State funding of the GLX, a plan always envisioned if federal funding is not forthcoming – which MassDOT admits is the case.

## **Legal**

The Green Line extension has been the State's single largest Transportation Control Measure (TCM) obligation under the State Implementation Plan (SIP) for air quality 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. The Green Line Extension has never been given top priority, even though the State is legally mandated to do so.

This newest proposed delay violates the Commonwealth's legal requirement to give highest priority in all transportation planning documents to those projects the State has promised will complete in order to become compliant with the federal Clean Air Act (SIP projects). The Green Line Extension not only is one of those projects, but it is the one the State says this project will provide by far the greatest air quality benefits. Therefore, money should be reallocated from other optional and lower priority transportation projects to the GLX.

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 TIP and the 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 state must pursue full bond funding of GLX to satisfy Federal Transportation Conformity.

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 Transportation Conformity Measures (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

The state is legally obligated to extend the Green Line to Medford Hillside; a terminus station at College Avenue is not in Medford Hillside. Failure to allocate funding for the extension to Route 16 by current legal deadline (Dec. 31, 2014) also violates the existing legal requirement.

## **Health Impacts**

The purpose of the Green Line Extension is to mitigate the health effects of vehicle pollution from I-93 and regional highway traffic, as well as regional ozone levels. 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 (Route 38) and McGrath Highway (Route 28). Somerville also breathes fumes from 200 daily diesel commuter and freight trains that cut through the City but (fortunately) do not stop.

The Green Line is desperately needed, especially in environmental justice neighborhood of East Somerville and the economic justice neighborhood of East Cambridge.

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 heart attack mortalities
- 50% higher childhood asthma rates

## **Sustainability**

The Green Line Extension is an excellent, sustainable transportation project. With the GLX, 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 is no wonder the Green Line is overwhelmingly supported in Somerville and surrounding communities. The GLX light rail system will provide clean transit to the city most health-burdened by highway and diesel commuter rail pollution.

The state points to the Green Line Extension as the hallmark of its “GreenDOT” environmental campaign, and a key to achieving the Massachusetts Global Warming Solutions Act’s requirement to reduce statewide greenhouse gas emissions by 25% of their 1990 levels by 2020. If this is the case, the project should be accelerated, not delayed. The Green Line Extension fully embodies the principles espoused by MassDOT’s GreenDOT initiative:

*“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”*

<http://transportation.blog.state.ma.us/blog/2010/06/massdot-launches-greendot.html>

## **Impact Of Delay On Transportation Funding and Regional/Statewide Economics**

The GLX delay could jeopardize the State’s federal transportation funding - a loss of \$650 million per year. The delay would also:

- 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.
- Deny a key regional transit link for employers, universities, research centers and residents.
- 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.
- 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.

## **Funding, Timing and Transparency**

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

The Green Line Extension communities have repeatedly welcomed project staff from MassDOT, the MBTA and their consultants. Cooperation, good rapport, and enthusiasm have generally been high on both sides whenever people have rolled up their sleeves to tackle project details. However, MassDOT has not been transparent at major steps with regard to securing real funding for the project and making reasonable time commitments.

MA DOT states that securing federal “New Starts” funding for the Green Line is risky because of the MBTA financial condition, but MassDOT 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 recent as May 2011, committed to completing the Green Line Extension at the end of 2015, provide no hint of further possible delays. This reflects a lack of transparency and seriousness in meeting the legal 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. The Greenbush Line land acquisition delays are not a valid comparison to the GLX because the land required for Greenbush was for right-of-way. GLX land acquisition is not for right-of-way, but for station locations and the maintenance facility. The maintenance facility not even included in the SIP agreement – and could be done much later, after the rest of the GLX is built

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. By contrast: This year, through the groundbreaking I-93 Fast14 Bridge Replacement Project, the state demonstrated a new commitment to completing transportation projects on time and on budget. The Green Line Extension project deserves an infusion of the same commitment and innovation, not yet another delay.

In summary, we hope our public comments have presented the compelling and even overwhelming case not to allow MassDOT to delay the Green Line Extension (and Community Path Extension) any longer.

Thank you very much.

Sincerely,

Handwritten signatures of Lynn Weissman and Alan Moore in cursive ink.

Lynn Weissman and Alan Moore  
Co-Presidents, Friends of the Community Path

*“To Lechmere – and beyond!”*

Attachments:

- Map of proposed Community Path along the GLX Route
- Over 200 letters supporting the Community Path and GLX Projects (to MPO, DEP, Governor Deval Patrick, Lieutenant Governor Timothy Murray, Congressman Michael Capuano, MassDOT Board)

cc:

Governor Deval Patrick  
Lt. Governor Timothy Murray

Ms. Anne Arnold, Manager, EPA Region 1 Air Quality Planning Unit,  
Mr. Donald Cooke, Conformity and mobile monitoring, EPA Region 1 Air Quality, Ms.  
Rosemary Monahan, EPA Region 1 Smart Growth Coordinator  
Ms. Pamela Stephenson, MA Division Administrator, Federal Highway  
Mr. Michael Chong, Federal Highway Planning and Environ. Program Manager  
Ms. Mary Beth Mello, Regional Director, Federal Transit Region 1  
Congressman Michael Capuano  
MassDOT Board of Directors  
Transportation Secretary Rich Davey  
Ms. Katherine Fichter, MassDOT Office of Transportation Planning,  
Mayor Joseph Curtatone, City of Somerville  
Hayes Morrison, City of Somerville  
Sara Spicer, City of Somerville  
Somerville Board of Aldermen  
Senator Patricia Jehlen  
Representative Denise Provost  
Representative Carl Sciortino  
Representative Timothy Toomey  
Ellin Reisner, STEP

