

**State Implementation Plan Public Meeting**  
*Massachusetts Department of Environmental Protection and  
the Massachusetts Department of Transportation*  
September 6, 2016 – 2:00 PM to 2:30 PM  
September 6, 2016 – 5:00 PM to 6:00 PM  
Massachusetts Department of Environmental Protection  
One Winter Street  
Washington Street Conference Center  
Boston, MA

**Attendees at Afternoon Session:**

Christine Kirby, Director, Air & Climate Division, Massachusetts Department of Environmental Protection (MassDEP)  
David Mohler, Executive Director, Office of Transportation Planning, Massachusetts Department of Transportation (MassDOT)

Representative Denise Provost  
Sharon Weber, Deputy Division Director, Air & Climate Programs, MassDEP  
Sejal Shah, MassDEP  
Anne McGahan, Central Transportation Planning Staff (CTPS)

**Attendees at Evening Session:**

Christine Kirby, Director, Air & Climate Division, MassDEP  
David Mohler, Executive Director, Office of Transportation Planning, MassDOT

Sharon Weber, Deputy Division Director, Air & Climate Programs, MassDEP  
Anne McGahan, CTPS  
Ellin Reisner, Somerville Transportation Equity Partnership  
Ken Krause, Medford resident  
Alan Moore, Friends of the Community Path  
Lynn Weismann, Friends of the Community Path

**Introduction**

Moderator Christine Kirby opened the annual meeting on MassDOT's 2016 annual update and status report for transit projects required by 310 CMR 7.36 in the State Implementation Plan (SIP). She provided background on the overall regulatory context of the SIP and the public process requirements.

MassDOT's annual report on the SIP was submitted to MassDEP on June 30, 2016, pursuant to the public process requirements of subsection (7) of 310 CMR 7.36, the Transit System Improvements regulation. Revisions to this regulation were effective

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December 2006. The U.S. Environmental Protection Agency (EPA) approved the revised regulation as a revision to the Massachusetts SIP in July 2008.

Under subsection (7) of 310 CMR 7.36, MassDOT is required to submit an annual update and status report on all uncompleted SIP requirements and submit that report to MassDEP. MassDEP is then required to hold a public meeting and take public comments. Within 120 days of this meeting, MassDOT is required to summarize and respond to all comments. Within 60 days of MassDOT's submission and response to comments, MassDEP is required to determine whether the public process requirements of the regulation have been met.

Testimony may be presented orally at this meeting or in writing. Written testimony will be accepted until 5:00 PM on Friday, September 16, 2016. Written testimony must be submitted to: Scott Hamwey, at MassDOT Office of Transportation Planning, Room 4150, Ten Park Plaza, Boston, MA 02116, or [scott.hamwey@dot.state.ma.us](mailto:scott.hamwey@dot.state.ma.us); and Sejal Shah at MassDEP, Bureau of Air & Waste, One Winter Street, Boston, MA 02108, or [sejal.shah@state.ma.us](mailto:sejal.shah@state.ma.us).

On June 14, 2016, MassDEP released a certification letter regarding MassDOT's 2015 status report. The letter states that MassDEP has determined that MassDOT met the public process and reporting requirements of subsection (7) of 310 CMR 7.36. The letter is available on the MassDOT website.

### **Status Report<sup>1</sup>**

David Mohler, Executive Director, Office of Transportation Planning, MassDOT, provided a summary of the status of the outstanding SIP commitments:

#### Red Line - Blue Line Connector Project

On December 8, 2015, the EPA published a final rule in the Federal Register that has removed this project from the SIP. This project will not be reported on in the future.

#### Fairmount Line Improvement Project

One station, Blue Hill Avenue, is left to be constructed and opened for service. In the filed report, MassDOT noted there would be a public meeting in early September 2016 with plans to move to advertising in mid-September 2016. These dates have been revised to October 5, 2016 and November 2016, respectively.

#### Green Line Extension Project

After review and redesign efforts, the project currently carries an estimated project cost of \$2.3 billion. The MBTA Fiscal Management & Control Board (FMCB) and the MassDOT Board have approved this cost. FTA has preliminary approved the redesigned

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<sup>1</sup> Status report current as of September 6, 2016 date of State Implementation Plan public meeting.

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project, but expressed concerns about MassDOT's staffing of the project; these concerns are currently being addressed. At the last FMCB meeting, the Board approved \$15 million more in contract award authority for the project, which will allow MassDOT to continue pre-procurement.

MassDOT was tasked with seeking additional regional and municipal financial contributions to the project. The Boston Region MPO reallocated \$158 million from Phase 2 of the project (Extension to Route 16) into Phase 1. \$6.4 million in FHWA funds were flexed to FTA funds in September 2016 and is now available for the project. In addition, there is a tentative commitment of \$25 million from the City of Cambridge and \$50 million from the City of Somerville. MassDOT is currently negotiating MOUs with both cities; the MOUs will hopefully be approved and endorsed in late fall 2016.

### **Oral Testimony – Afternoon Session**

#### Representative Denise Provost, 27<sup>th</sup> Middlesex District

Representative Provost stated that public outreach efforts for this meeting were not sufficient, noting a lack of email notifications to prior SIP meeting attendees and technical issues with the SIP report and the MassDOT website. She added that the day after Labor Day is not an ideal time for the annual SIP meeting.

She requested that future SIP reports contain more substantive information regarding the status of projects, noting a lack of an updated estimated completion date for the Green Line Extension (GLX). This is important to both properly summarize the project and to make the public aware of how long the interim offsets may need to be in place. She added that the interim offsets are vaguely summarized, with very little quantification of their effects. The value of the SIP report would be enhanced with the inclusion of the estimated greenhouse gas reductions of the offsets; she also requested ridership / utilization information for the additional off-peak bus service, THE RIDE, and the park-and-ride facilities in Salem and Beverly. She expressed that without this information, individuals cannot determine if these mitigation efforts are effective. If the efforts are not effective, the City of Somerville could provide mitigation efforts that would help the corridor.

Representative Provost stated that many people in Somerville make vehicle trips that they would be tempted not to make if there was a realistic transit alternative.

### **Oral Testimony – Evening Session**

#### Ellin Reisner, Somerville Transportation Equity Partnership

Ms. Reisner stated that MassDEP has not displayed leadership in addressing the impact of Green Line Extension delays on the air quality of residents in the affected

communities. GLX was originally scheduled to open in 2011, and she expressed that “we will be lucky” if it is completed by 2021.

She noted that GLX is a legal obligation under the Clean Air Act and is the Commonwealth’s single largest Transportation Control Measure (TCM) obligation under the SIP. Federal Transportation Conformity Regulations require that SIP TCMs be given funding and completion priority by the region and state. Despite this, there have been delays and threatened cancellation of GLX while the Commonwealth invests in projects such as South Coast Rail.

Ms. Reisner stated that the interim offset projects selected by MassDOT were not those recommended by respondents in affected communities. The 2016 SIP report does not provide substantiation of completion of these offset projects, indication if they were implemented<sup>2</sup>, or measurement of the benefits provided. She expressed that air quality in the affected communities has not improved, adding that MassDOT and MassDEP are not addressing the health impacts of the delays and possible cancellation of the project.

### Ken Krause, Medford Resident

Mr. Krause stated that this is the tenth SIP meeting he has attended. He noted the frustration of those who have waited to see the completion of the Green Line Extension, but noted that the pause in the project has had some benefits. The redesign has allowed the project to move forward, and flaws in project management and procurement have been identified and addressed. He expressed confidence that these improvements will prevent further delays, and complimented MassDOT, the MBTA, and Jack Wright of the Interim Project Management Team for their public engagement efforts.

Mr. Krause stated that the truncated Community Path Extension (CPX) is a serious flaw with regard to environmental benefits, as this project complements GLX by both providing a route to the Green Line and allowing other modes of transportation. The Community Path also connects to the larger path network, which extends to Bedford; however, the current design for the Community Path would result in a network gap in East Cambridge. He expressed hope that MassDEP identifies this as an issue that should be revisited to allow for a complete Community Path.

He expressed frustration regarding the reallocation of Phase 2 funding. He acknowledged that the Green Line needs to be extended to College Avenue before it can proceed to Route 16, but stated that the air quality benefits provided by a full extension are significant. The reduction in vehicle miles traveled at the Route 16 terminus is more than ten percent above that of the project terminating at College Avenue. As such, he stated that it is important that the Route 16 terminus remain an important part of the Green Line Extension. He noted that the MBTA and MassDOT have committed to conducting a full environmental impact report<sup>3</sup> on the Route 16 station in the fall and winter of 2016-17; in

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<sup>2</sup> For information on Green Line Extension offset measures, please refer to page 15 of the *State Implementation Plan – Transit Commitments 2016 Status Report*.

<sup>3</sup> MBTA/MassDOT are working on an environmental notification form.

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their evaluation, MassDEP will hopefully stress that they would like to see the environmental impact report fully completed and the full extension remain on the table.

Mr. Krause stated that the SIP report does not adequately address the interim offset projects. The interim offsets were required to be implemented as of January 1, 2015 due to the Commonwealth not meeting the deadline to complete the Green Line Extension. The report states that the interim offsets were approved on July 16, 2015, presumably when they came into effect, but there is no indication if these projects are providing air quality benefits equal to those of the Green Line Extension. Mr. Krause suggested that MassDEP require evaluation and performance reports on the offset projects in future SIP reports. If they are not providing adequate air quality benefits, new projects should be put in place.

He expressed hope that MassDEP champion the Green Line Extension. Advocates for the project need the agency's support and perhaps aid in identifying additional funding.

### Alan Moore, Friends of the Community Path, Somerville resident

Mr. Moore expressed agreement with statements provided by Ms. Reisner and Mr. Krause. He stated that while he appreciates the efforts of the engineering team hired to reduce costs, most of the savings are from removing aspects of the Green Line Extension. This includes constructing simple stations and reducing the length of the Community Path Extension. He asked that MassDEP reiterate to MassDOT that there is more they can do to reduce costs, while keeping more elements of the projects.

He stated that the Friends of the Community Path (FCP) has provided MassDOT with plans for a full CPX within the current price range; cost savings can be achieved by changing what FCP views as strict engineering requirements to design the CPX. As an example, he noted that a cost saving measure for GLX stations was to allow passengers to cross tracks to reach a center platform, rather than use elevators; similar measures can be taken with the CPX. FCP is still asking that MassDOT review their design.

Mr. Moore added that other design issues were identified by a group of stakeholders which could reduce costs of the GLX, many of which have not been studied.

### Lynn Weismann, Friends of the Community Path

Ms. Weismann stated that the Green Line Extension needs to be built to Route 16. She expressed that the project should be completed before the Commonwealth takes on other multi-billion dollar transit projects. The Community Path Extension should be fully built to Lechmere as part of the Green Line Extension. She noted that FCP has requested a meeting with Green Line team to discuss alternative designs for the CPX. She expressed hope that the Green Line bids will both include a full CPX and require alternative technical concepts for the path as part of the project.