



Charles D. Baker, Governor
Karyn E. Polito, Lieutenant Governor
Stephanie Pollack, MassDOT Secretary & CEO



January 31, 2019

Mr. Martin Suuberg
Commissioner
Department of Environmental Protection
1 Winter Street
Boston, MA 02108

Dear Commissioner Suuberg:

Pursuant to Section 7 of amended 31 CMR 7.36, *Transit System Improvements*, please find enclosed our responses to public comments on the 2018 Status Report on transit projects required under the revised State Implementation Plan (submitted to the Department of Environmental Protection (DEP) on July 3, 2018). Section 7 requires the Massachusetts Department of Transportation to file a summary of all public comments and written responses to those comments within 120 days of the public meeting also required by Section 7. A public meeting was held by DEP on September 11, 2018.

The 2018 Status Report will be made publicly available on the MassDOT website at www.massdot.state.ma.us/SIP.

If you have any questions or concerns, or if we can be of further assistance, please do not hesitate to contact me at (857) 368-8865 or david.mohler@state.ma.us.

Sincerely,

David Mohler
Executive Director
Office of Transportation Planning

cc: Christine Kirby, DEP



Charles D. Baker, Governor
Karyn E. Polito, Lieutenant Governor
Stephanie Pollack, MassDOT Secretary & CEO



State Implementation Plan – Transit Commitments
2018 Status Report
Agency Response to Public Comments

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**COMMONWEALTH OF MASSACHUSETTS
MASSACHUSETTS DEPARTMENT OF TRANSPORTATION
OFFICE OF TRANSPORTATION PLANNING
MEMORANDUM**

TO: Martin Suuberg
Commissioner
Department of Environmental Protection

FROM: David J. Mohler
Executive Director
MassDOT Office of Transportation Planning

DATE: January 31, 2019

RE: 310 CMR 7.36 (7)(c)

This memo is intended to fulfill the reporting requirements of 310 CMR 7.36 (7)(c), in which the Massachusetts Department of Transportation must attest that:

- MassDOT has provided complete information for all requirements of 310 CMR 7.36 (7)(a).
- MassDOT has provided complete information about any actual or known potential need and reasons for a project substitution pursuant to 310 CMR 7.36(4)(b).
- MassDOT has provided complete information on the interim offset projects implemented or proposed to be implemented pursuant to 310 CMR 7.36(4)(b) and (5)(g)4.

I certify that all the information listed above has been provided and that MassDOT has, to the best of its ability, fulfilled all public processes and reporting requirements described in 310 CMR 7.36 (7).



David J. Mohler
Executive Director
MassDOT Office of Transportation Planning

Comments Received on the MassDOT 2018 Status Report (by format and date)

Written Testimony					
Date	Title	First Name	Last Name	Affiliation	Additional Authors
9/24/2018	Co-President	Lynn	Weissman	Friends of the Community Path	Alan Moore
9/24/2018	Senator	Patricia	Jehlen	Massachusetts State Senate	
9/25/2018		Ken	Krause	Medford Resident	

Comments Received on the MassDOT 2018 Status Report (by format and date)

Oral Testimony					
Date	Title	First Name	Last Name	Affiliation	Additional Authors
9/11/2018		Wig	Zamore	Somerville Resident	



**Massachusetts Department of Transportation
Massachusetts Bay Transportation Authority**

**State Implementation Plan – Transit Commitments
2018 Status Report
*Agency Response to Public Comments***

**Submitted to the
Massachusetts Department of Environmental Protection
January 31, 2019**

For questions on this document, please contact:
Massachusetts Department of Transportation
Office of Transportation Planning
10 Park Plaza, Room 4150
Boston, Massachusetts 02116 planning@dot.state.ma.us

INTRODUCTION

This document summarizes and responds to public comments received by the Massachusetts Department of Transportation (MassDOT) on the *State Implementation Plan-Transit Commitments 2018 Status Report* (the Status Report) submitted to the Massachusetts Department of Environmental Protection (DEP) on July 3, 2018 in order to fulfill the requirements of 310 CMR 7.36, *Transit System Improvements*. The Status Report detailed the status of two public transit projects – listed below – required of MassDOT under 310 CMR 7.36. The projects are:

- Fairmount Line Improvement Project
- Green Line Extension to Somerville and Medford

MassDOT accepted public comments on the Status Report through September 25, 2018, following two public meetings (held on September 11, 2018) at which MassDOT staff presented an overview of the contents of the Status Report, and members of the public asked questions and provided feedback and comments. All of the comments received by MassDOT pertained to the extension of the Green Line to Somerville and Medford, and to MassDOT's interim emissions reduction offset measures. MassDOT staff reviewed all of the comments received – they are appended here in full, as is a list of all the submitting individuals and organizations – and have grouped and summarized them so as to capture the salient ideas while reducing redundancy and overlap. In this document, indication of the authorship of each comment has been omitted.

Each year, MassDOT receives comments and questions in response to the Status Report that are similar to comments and questions received in past years. When that happens, MassDOT will often refer the commenter back to an earlier response or, if the issue has changed in a meaningful way, will clarify and update earlier responses as appropriate. MassDOT staff recognize that major decisions relating to the implementation of SIP projects do not, and likely cannot, satisfy all project advocates, and that decisions can and will continue to generate public controversy into the future, even when MassDOT considers an issue to be resolved. MassDOT will continue to respond to questions and concerns as they come up.

Throughout this document, the SIP regulation (310 CMR 7.36) is referenced. Additional information and detail on the regulation (310 CMR 7.36) can be viewed at:

<http://www.massdot.state.ma.us/SIP>

I. GREEN LINE EXTENSION TO SOMERVILLE AND MEDFORD

Mitigation for GLX Tree Loss Far Exceeding MEPA Threshold for Review: Per Section 2b: 301 CMR 11.00: MEPA Regulations, the cutting of “five or more living public shade trees of 14 or more inches in diameter at breast height’ meets the threshold for a MEPA review of projects that are likely, directly or indirectly, to cause Damage to the Environment. <https://www.mass.gov/regulations/301-CMR-1100-mepa-regulations>. In the last few weeks, hundreds (thousands, who knows?) of mature trees were unselectively razed along the GLX corridor. The caliper of many of these trees exceeded 14" in many of these trees. We ask that the State assess the loss of trees and biomass here and mitigate the environmental damage by covering the cost of planting number similar of trees around Somerville to the number removed)in the corridor in preparation for construction.

MassDOT appreciates the concern of some residents along the Green Line Extension corridor about the recent tree clearance program. As the corridor needs to be widened, and the existing soil bank replaced with concrete retaining walls, to provide room for the construction of almost five miles of new light rail infrastructure, the trees needed to be removed to make way for the coming work. In addition, the trees were removed to allow for the installation of Positive Train Control equipment, as is happening through the MBTA Commuter Rail network. MassDOT and the MBTA strive to avoid and reduce construction impacts whenever possible, but some are integral to the construction of a project of this magnitude and significance.

Build the full GLX to Route 16: All GLX stations should be included, including the Route 16 station, which will serve Medford, Somerville, and E. Arlington, and links to the Alewife Brook/Mystic River paths. Building the GLX to Route 16, as part of this legally mandated project, has been promised for decades. This extension must not get postponed while the State advances other multi-billion-dollar transit projects. The College Ave. terminus station does not page 3 of 6 satisfy the SIP commitment because it does not extend service to what “Medford Hillside.

There are some new station design options proposed by Medford citizens that will make the GLX extension to Route 16 more affordable and will require less impact of the community. Please work with these Medford citizens to advance a cost-effective station design at Route 16.

This issue has been asked and answered many times in the past. The geographic parameters of the Green Line Extension project have been confirmed as compliant with the requirements of the State Implementation Plan by both state and federal agencies.

MassDEP should instruct MassDOT to abide by its stated commitment to properly characterize the nature of the reprogrammed MPO money in all SIP documents.

MassDOT now makes it clear in all SIP documents that, in 2016, the Boston Regional Metropolitan Planning Organization reprogrammed funds that were initially intended to construct an additional extension of the Green Line to Route 16 in order to help close a funding gap in the budget for the core Green Line Extension project.

MassDEP should require MassDOT to fulfill its commitment to completing the Route 16 EIR in a timely fashion, provide updates to MassDEP on its progress, and report to MassDEP on its findings and conclusions, including in the Status Report.

Consistent with its inclusion as a next priority in draft Focus40 plan, MassDOT and MBTA remain committed to an EIR for the Route 16 extension.

Additional Interim Offset Measures for GLX delays

The Friends of the Community Path urge MassDOT/MBTA to design and construct a GLX Twin Cities path spur from the CPX to Twin Cities Plaza, because the air quality benefits of this path-to-path connection are permanent, with long-term rather than just temporary air quality benefits.

The full-build Community Path extension to Lechmere Station will be constructed as part of the Green Line Extension project. This does not include a “Twin Cities Path.”

Provide free MBTA transit passes and BlueBike use programs during the delay.

MassDOT does not believe that additional mitigation is warranted to address the delay in the implementation of the Green Line Extension.

Reject any additional diesel rail stops on commuter rail lines through the area.

There are no plans for MassDOT or the MBTA to construct any new Commuter Rail stations in the Green Line Extension project corridor.

Designate new cleaner diesel commuter rail locomotives to the GLX corridors.

MassDOT does not believe it would be equitable or practicable to isolate the use of specific locomotives to specific corridors. Other corridors within the commuter rail network also pass through Environmental Justice (EJ) communities - in fact, the Lowell Line, which travels along the Green Line Extension corridor, operates within EJ communities for fewer miles than does any other MBTA commuter rail line.

MassDEP should require MassDOT and the MBTA to present a detailed analysis of the effectiveness of the interim offset projects in the Status Report on the Transit Commitments due each July 1, and to reconsider and provide alternative interim offset projects if the ones in place are not achieving the required emission reductions.

I again request that DEP require that the current offsets be examined for validity and effectiveness, and that MassDOT be required to propose and implement any necessary additional offsets should the current offsets prove to be falling short of expectations.

The SIP requires MassDOT to propose and obtain approval on mitigation measures. MassDEP approved the interim offset measures MassDOT proposed, which MassDOT implemented in 2014 and has operated ever since. The SIP does not require ongoing modeling of these interim offset measures.



Charles D. Baker, Governor
Karyn E. Polito, Lieutenant Governor
Stephanie Pollack, MassDOT Secretary & CEO

massDOT
Massachusetts Department of Transportation

July 3, 2018

Mr. Martin Suuberg
Commissioner
Department of Environmental Protection
1 Winter Street
Boston, MA 02108

Dear Commissioner Suuberg:

The Massachusetts Department of Transportation (MassDOT), in conjunction with the Massachusetts Bay Transportation Authority (MBTA), is submitting the attached report to the Department of Environmental Protection (DEP) in order to fulfill the requirements of 310 CMR 7.36, *Transit System Improvements*. This Annual Report provides a project description and status information for each of the outstanding public transit projects required under the amended State Implementation Plan (SIP).

Please do not hesitate to contact me at (857) 368-8865 if you would like to discuss further.

Sincerely,

David J. Mohler
Executive Director
MassDOT Office of Transportation Planning

cc: Christine Kirby, Department of Environmental Protection

Ten Park Plaza, Suite 4150, Boston, MA 02116
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www.mass.gov/massdot



Massachusetts Department of Transportation

Massachusetts Bay Transportation Authority

State Implementation Plan – Transit Commitments

2018 Status Report

Submitted to the
Massachusetts Department of Environmental Protection

July 3, 2018

For questions on this document, please contact:

Massachusetts Department of Transportation Office
of Transportation Planning

10 Park Plaza, Boston, Massachusetts 02116

planning@dot.state.ma.us

INTRODUCTON

This report is submitted by the Massachusetts Department of Transportation (MassDOT), in conjunction with the Massachusetts Bay Transportation Authority (MBTA), to the Massachusetts Department of Environmental Protection (DEP) in order to fulfill the requirements of 310 CMR 7.36(7), *Transit System Improvements*. Below is a project description and status information for each of the outstanding public transit projects required under the amended State Implementation Plan (SIP).

As noted in previous Status Reports, MassDOT is no longer reporting on the Red Line/Blue Line Connector Design, Blue Line Platform Lengthening and Station Modernization, the Greenbush Commuter Rail Restoration, and the Construction of 1,000 Parking Spaces. All of those projects have been completed and MassDOT believes that the relevant commitments have been met. On December 8, 2015, the Environmental Protection Agency published a final rule in the Federal Register approving a revision submitted by the Commonwealth of Massachusetts to remove from the SIP the commitment to design the Red Line/Blue Line Connector project.

As always, MassDOT hopes to make the annual Status Report process one of iterative improvement, and looks to DEP and to the public for comments and other suggestions to refine its efforts.

This report (along with past reports and supporting documents) will be posted to MassDOT's SIP Regulations website at:

<https://www.massdot.state.ma.us/planning/Main/PlanningProcess/StateImplementationPlan/SIPTransitCommitmentSubmissions.aspx>

I. FAIRMOUNT LINE IMPROVEMENT PROJECT

SIP Requirement

Before December 31, 2011, construction of the following facilities shall be completed and opened to full public use: Fairmount Line improvements consisting of enhancements of existing stations including without limitation: platform extensions; improved lighting and improved access; a new station in the general location of Four Corners, and a new station in each of the neighborhoods of Dorchester, Mattapan and Roxbury; and bridge upgrades and other measures to improve service and increase ridership (the Fairmount Line project). EOT¹ shall meet the following interim deadlines for the Fairmount Line Project:

A. One year from the effective date of this regulation (December 1, 2006), develop a Request for Proposals for a design consultant, complete the competitive procurement process, and issue a notice to proceed for a design consultant.

✓ Done

B. Within two years following the issuance of a notice to proceed, complete final design, apply for all necessary permits and grants, file any required legislation, and initiate all public and private land acquisition.

✓ Done (for all elements of the project except for Blue Hill Avenue Station)

Project Description

The 9.2-mile Fairmount commuter rail line runs from South Station, previously served four stations (Uphams Corner, Morton Street, Fairmount, and Readville) in the communities of Dorchester, Mattapan, and Hyde Park, and terminates in the Readville section of Boston. The line, which uses right-of-way entirely owned by the MBTA, also includes 41 bridges. It is the only commuter rail line that exclusively serves neighborhoods within the City of Boston, but ridership has historically been low and passenger facilities along the line have not met modern standards.

The Fairmount Line Improvement Project is defined as the rehabilitation of the existing Uphams Corner and Morton Street Stations, construction of four new stations (Newmarket, Four Corners, Talbot Avenue, and Blue Hill Avenue), reconstruction of six existing railroad bridges (located over Columbia Road, Quincy Street, Massachusetts Avenue, Talbot Avenue, Woodrow Avenue, and the Neponset River), and construction of a new interlocking and upgraded signal system (required to advance the bridge reconstruction work). The intent of these upgrades has been to enhance future service, allowing for increased frequency on the line.

Planning Conformity

Throughout the life of the project, improvements to the Fairmount Line have been included in all relevant transportation planning documents, including the Regional Transportation Plans of the Boston Region Metropolitan Planning Organization (MPO).

¹ EOT is the predecessor to the legislatively-created Massachusetts Department of Transportation (MassDOT). For the purposes of referencing 310 CMR 7.36(7) *Transit System Improvements* of the SIP, this report will continue to use the EOT designation. However, the MassDOT designation will be used for all other language or text contained in this report.

Project Status

The sections below describe the current status of the different elements of the Fairmount Line Improvement Project.

Systems

Necessary upgrades to the required interlocking and signal systems have been completed and are currently in use, which has allowed for the reconstruction of structurally deficient bridges along the Fairmount Line.

Bridges

A construction contract to replace the Columbia Road, Quincy Street, and Massachusetts Avenue bridges was awarded in October of 2007, and construction was completed in 2010. The construction of the Talbot Avenue and Woodrow Avenue bridges is complete (see “New Stations” below). Construction of three bridges over the Neponset River began in fall 2010, and was completed in summer 2013.

Existing Stations

As stated above, existing stations at Uphams Corner and Morton Street required only rehabilitation for the project. The MBTA held a station re-opening at Uphams Corner on January 23, 2007. The reconstruction of Morton Street was celebrated at a station re-opening on July 17, 2007. New elements at both stations include extended high-level passenger platforms, accessible walkways, canopies, benches, windscreens, signage, bicycle racks, variable messages signs, lighting, and landscaping. Work at both stations is complete.

New Stations

Four Corners Station opened for service July 1, 2013. The station had been under construction since January 2010. The construction of Four Corners Station experienced delays due to unforeseen geotechnical conditions, relocation of existing utilities, and a redesign of the inbound sloped walkway structure at Geneva Avenue. Substantial completion of Four Corners Station occurred in June 2013 and final construction was complete in September 2013. All outstanding change orders have been paid and the project is officially closed out.

The construction of Talbot Avenue Station and the Talbot and Woodrow Avenue Bridges Rehabilitation projects began in fall 2010. The construction lasted approximately twenty-six months, with substantial completion of the station and the bridges in October 2012 and final completion of work in January 2013. The structural replacement of the two bridges was completed over weekends in November and December 2011. Talbot Avenue Station opened in November 2012.

Newmarket Station opened for service on July 1, 2013. The station had been under construction since October 2010. Delay in the completion of the station was attributed to the discovery of an existing power duct bank for the South Bay Shopping Center not previously identified on any existing utility plans. The necessity to redesign elements of the inbound and outbound retaining walls and a delay in the manufacturing of the precast concrete platform panels further contributed to the delay.

90% design plans were received in July 2015 and 100% plans were submitted March 2016 for Blue Hill Avenue Station. A public meeting was held in September 2016 to announce the project advertisement and bid date. MBTA advertised the project on December 9, 2016 with an engineer's estimate of \$19,326,378. The bid opened on January 17, 2017. There were seven (7) bidders and McCourt Construction was the low bidder (\$16,973,094.00). Notice to Proceed (NTP) was issued on February 2, 2017. Construction is currently ongoing. Substantial completion is expected April 2019.

Project Funding

In August 2007, MassDOT and the MBTA executed a contract to transfer approximately \$39 million from the 'immediate needs' Transportation Bond Bill of 2007 (which provided Commonwealth bond funding to support the costs of the SIP projects) from MassDOT to the MBTA to support the costs of (1) signal work, (2) reconstructing the Columbia Road, Quincy Street, and Massachusetts Avenue Bridges, (3) designing the Talbot Avenue, Woodrow Avenue, and Neponset River Bridges, and (4) designing the Newmarket, Talbot, and Blue Hill Avenue Stations.

A supplemental funding agreement providing \$23,756,574 in Commonwealth bond funding to the MBTA was executed in June 2009 in order to advance the construction of the station at Four Corners. A third funding agreement, approved in June 2011 in the amount of \$61,616,500, has allowed the remaining stations (including Blue Hill Avenue) and bridges to advance. These contracts total approximately \$124.4 million in authorized spending on the Fairmount Line Improvement Project to this point. In September 2015, the funding agreement was renewed after expiring for \$26,500,000 for the remaining value to cover Blue Hill Avenue Station construction cost and remaining legacy costs.

SIP Requirement Status

Community concerns regarding the construction of the Blue Hill Avenue Station, as well as construction challenges throughout the Fairmount Line project, resulted in a delay of the overall Fairmount Line Improvement Project beyond the December 31, 2011 SIP deadline. However, three of the four stations – Four Corners, Talbot Avenue, and Newmarket – are open for service, although they were completed after the required SIP deadline. A reliable completion date for Blue Hill Avenue station now is expected to be in April 2019.

Given the delays in final completion of the project, MassDOT prepared a Petition to Delay and an Interim Emission Offset Plan, to be implemented for the duration of the delay. Both the Petition and Offset Plan were submitted to DEP on July 27, 2011, and are posted to the MassDOT SIP website.

As described in the Offset Plan, MassDOT estimated the reduced emissions expected to be generated by the implementation of the new Fairmount Line stations. MassDOT and the MBTA, in consultation with Fairmount Line stakeholders, identified a set of potential interim emission reduction offset measures that would meet the emissions reduction targets. MassDOT submitted these proposed measures to DEP in a July 27, 2011 petition, after which time MassDOT and the MBTA continued to work to refine the offset concepts for implementation, including a second letter to DEP (dated November 29, 2011) describing changes to the proposed offsets. On January 2, 2012 (the first weekday following January 1), the offset measures were implemented: additional trips via a dedicated shuttle on the CT3 bus route between Andrew Station and Boston Medical Center and increased weekday frequency on the Route 31 bus. These services will remain in place until the Fairmount Line Improvement Project is fully complete.

II. GREEN LINE EXTENSION TO SOMERVILLE AND MEDFORD

SIP Requirement

Before December 31, 2014, construction of the following facilities shall be completed and opened to full public use: 1. The Green Line Extension from Lechmere Station to Medford Hillside; 2. The Green Line Union Square spur of the Green Line Extension to Medford Hillside; and

- ✓ *On or before 18 months following the effective date of the regulation (December 1, 2006), MassDOT must develop a request for proposals for a design consultant, complete the competitive procurement process, and issue a notice to proceed.*
 - ✓ Done
- ✓ *Within 15 months of the completion of the above requirements, MassDOT must complete conceptual design and file an Environmental Notification Form.*
 - ✓ Done
- ✓ *On or before two years after MEPA's issuance of a scope for a Draft Environmental Impact Report or a Single Environmental Impact Report, MassDOT must complete preliminary design and file a DEIR or SEIR.*
 - ✓ Done
- ✓ *On or before one year after MEPA's issuance of a scope for a Final Environmental Impact Report, MassDOT must file an FEIR.*
 - ✓ Done
- ✓ *On or before 18 months after MEPA's issuance of a certificate on an FEIR or an SEIR, MassDOT must complete final design, apply for all necessary permits, funds and grants, file any required legislation, and initiate all public and private land acquisition.*
 - ✓ Done
- ✓ *Upon completion of all of the above milestones, DEP and MassDOT shall establish a schedule for project construction and deadlines for project completion.*
 - ✓ Done

Extensive information about the Green Line Extension project can be found at www.mass.gov/greenlineextension.

Project Description

The Green Line Extension project is a 4.7-mile light rail line, which will extend the current Green Line service from a relocated Lechmere Station in East Cambridge, Massachusetts, to a terminus at College Avenue in Medford, Massachusetts and a spur to Union Square in Somerville, Massachusetts. This project is moving forward with a new cost estimate of \$2.289 billion. Funding is in place, including a combined \$1.99 billion in federal and state funds and pledged contributions totaling approximately \$296 million from the Cities of Cambridge and Somerville (\$75 million), the Boston Region Metropolitan Planning Organization (\$157.1 million), and MassDOT (\$64.3 million through Special Obligation Bonds).

In early 2017, the MBTA initiated a procurement process for a Design-Build (DB) entity to design and construct the project. In November 2017, Board approval was received to execute a Design-Build contract with GLX Constructors. The notice to proceed under the contract was issued in December 2017. The Federal Transit Administration obligated an initial tranche (\$100 million) of the Capital Investment Grant funds for the project in December 2017, under the 2015 Full Funding Grant Agreement (FFGA). Additional funds have since followed.

The contract with GLX Constructors is in the amount of \$954 million.

The primary goals of the Project are to improve corridor mobility, boost transit ridership, improve regional air quality, ensure equitable distribution of transit services, and support opportunities for sustainable development in Cambridge, Somerville, and Medford. This project comprises light rail service on two new branches extending from Lechmere Station in Cambridge to Union Square Station in Somerville and College Avenue Station in Medford, together with a Vehicle Maintenance Facility ("VMF") and a multiuse path.

Planning Conformity

Throughout the life of the project, the Green Line Extension project has been included in all relevant transportation planning documents, including the Regional Transportation Plans of the Boston Region Metropolitan Planning Organization (MPO).

Project Schedule

Early Works Activities – Keolis / Railroad Operations

Three 'early action' tasks that have been underway since 2017 in order to have some of the early track, drainage, retaining wall, and signal work activities completed prior to the start of heavy construction. This work is expected to be substantially complete during the fall of 2018.

Overall Project Baseline Schedule

Milestones for project completion have been established and made part of the Design Build contract. The milestones have been incorporated into that contract. By establishing these milestones, MassDOT has met the sixth and final interim milestone found in the SIP regulation. ("Upon completion of all of the above

milestones, DEP and MassDOT shall establish a schedule for project construction and deadlines for project completion.”). The schedule is shown below.

Critical Program Milestone Deadlines			
Milestone	Current Contractual Date	MBTA Forecast	DB Entity Forecast
Notice to Proceed (Start of DB Contract)	20-Dec-17	20-Dec-17	20-Dec-17
Milestone 5: VMF Functionally Complete & Ready for MBTA Operational Testing	09-Oct-20	09-Oct-20	09-Oct-20
Milestone 4C: Revenue Service for 1st GL Branch	28-Apr-21	28-Apr-21	28-Apr-21
Milestone 3C: Revenue Service 2 nd GL Branch	10-Jul-21	10-Jul-21	10-Jul-21
Program Completion Milestone	15-Dec-21	15-Dec-21	15-Dec-21

SIP Requirement Status

By filing an Expanded Environmental Notification Form, procuring multiple design consultants, and publishing both Draft and Final Environmental Impact Reports, MassDOT has met the first four interim milestones associated with the Green Line Extension project. MassDOT – which has committed substantial resources to the Green Line Extension project, a top transportation priority of the Commonwealth and the largest expansion of the MBTA rapid transit system in decades – has transitioned the project from the planning and environmental review phases to design, engineering, and eventual construction, coupled with the tasks associated with programming federal funding.

In the 2011 SIP Status Report, MassDOT reported that the Green Line Extension project would not meet the legal deadline of December 31, 2014.

The timeline for overall project completion represents a substantial delay beyond the SIP deadline of December 31, 2014, triggering the need to provide interim emission reduction offset projects and measures for the period of the delay (beginning January 1, 2015). Working with the Central Transportation Planning Staff, MassDOT and the MBTA calculated the reductions of NMHC, CO, and NO_x – reductions equal to or greater than the reductions projected for the Green Line Extension itself, as specified in the SIP regulation – that are required for the period of the delay.

In June 2012, MassDOT released a list of potential mitigation ideas received from the public that could be used as offset measures. In the summer and fall of 2012, MassDOT solicited public comments on these potential measures. The MBTA created an internal working group to determine a final portfolio of interim mitigation measures to implement by December 31, 2014, the legal deadline for the implementation of the Green Line Extension.

This work resulted in a recommendation to implement the following three interim mitigation measures which collectively would meet the emissions reduction target for the project:

- Additional off-peak service along existing routes serving the corridor, including the Green Line, and bus routes 80, 88, 91, 94 and 96;
- Purchase of 142 new hybrid electric vehicles for The RIDE;
- Additional park and ride spaces at the Salem and Beverly intermodal facilities.

The Petition to Delay was submitted to the Massachusetts Department of Environmental Protection (DEP) on July 22, 2014, and expanded further on the analysis and determination of the interim offset measures. In a letter dated July 16, 2015, the DEP conditionally approved MassDOT's request to delay the Green Line Extension project and the implementation of the above interim mitigation measures. Both the 2014 Petition to Delay and the July 2015 Conditional Approval are available on MassDOT's website. Interim offset measures will remain in place for as long as is necessary.

State Implementation Plan Public Meeting
*Massachusetts Department of Environmental Protection and
the Massachusetts Department of Transportation*
September 11, 2018 – 2:00 PM to 3:00 PM
September 11, 2018 – 5:00 PM to 6:00 PM
Massachusetts Department of Environmental Protection
One Winter Street
Washington Street Conference Center
Boston, MA

Attendees at Sessions:

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)

Haidee Janak, Branch Chief, Transportation Programs, MassDEP

Nancy Seidman, Assistant Commissioner, Bureau of Air & Waste, MassDEP

Scott Hamwey, Office of Transportation Planning, MassDOT

Anne McGahan, Central Transportation Planning Staff

Sejal Shah, Bureau of Air & Waste, MassDEP

Wig Zamore, Somerville resident (Evening Session only)

Introduction

Moderator Christine Kirby opened the meeting on MassDOT's 2018 Status Report on the State Implementation Plan (SIP). Nancy Seidman, Assistant Commissioner, Bureau of Air & Waste, MassDEP, provided background on the overall regulatory context of the SIP and the public process requirements.

MassDOT's Status Report for 2018 on the SIP was submitted to MassDEP on July 3, 2018, 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 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 a Status Report annually 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.

2018 Status Report¹

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

Fairmount Line Improvement Project

The final station is the Blue Hill Avenue Station, which is under construction with a projected opening date of April 2019. MassDOT implemented offset measures for failure to meet the SIP deadline of including additional trips via dedicated shuttle, the CT3 Route between Andrew Station and Boston Medical Center, and increased weekday frequency on the Route 31 bus. Those services have been in effect since January 2012 and will remain in effect until the project is complete.

Green Line Extension Project

MassDOT awarded a contract to a Design Build team in December 2017. MassDOT expects to have revenue service for the main branch open in April 2021 and revenue service for the Union Square branch in July 2021, with final program completion by December 2021. Since 2014, MassDOT has implemented offset measures. These measures are: additional off-peak service on existing routes serving the corridor (the Green Line, bus route 80, 88, 91, 94, and 96); purchasing 142 hybrid electric vehicles for the RIDE; and constructing additional Park and Rides at the Beverly and Salem intermodal facilities.

Oral Testimony – Afternoon Session

No citizens submitted testimony in the afternoon session.

Oral Testimony – Evening Session

Wig Zamore, Somerville resident

Mr. Zamore first recommended that MassDOT and MassDEP only host one of their sessions, either in the afternoon or in the evening, since it is unnecessary to host two.

Mr. Zamore spoke about different global concerns regarding air pollution, including household air pollution caused by poorly ventilated wood stoves in rural areas and developing countries, which disproportionately affects women and children and, and occupational exposure to diesel, which is particularly prevalent in the trucking industry. Exposure to black carbon (formed from diesel) and diesel PM (particulate matter) are linked to serious health outcomes including lung cancer.

Mr. Zamore then spoke about several national and regional concerns. New England has gained control over ozone, a regional pollutant that is not linked to premature mortality. Lead is also a concern in the region, but does not have an effect on air quality. He urged the field to ensure black carbon is included in discussions of climate change and to shift rhetoric from greenhouse gases to climate pollutants.

Mr. Zamore discussed concerns related to aviation and how government calculates pollution from aviation, as emissions produced over 3,000 feet in the air are not reported. These emissions do not have impacts on health, but do on climate. He urged Logan Airport to revise its analysis. Mr. Zamore briefly discussed the role of direct

¹ Status up to date as of September 11, 2018, the date of the State Implementation Plan public meeting.

and indirect emissions from the building sector, noting that transportation has moved ahead of buildings in terms of direct emissions, in part because Massachusetts and other places have done a good job of sourcing electricity and other energy from greener and renewable sources. He urged Massachusetts to increase the amount of energy sourced from offshore wind. This approach could fulfill the Commonwealth's energy needs twenty times over and create new jobs. Lastly, he noted that species extinction in the oceans may be a greater issue than sea level rise.

Next, Mr. Zamore turned to a discussion to transportation pollution and mitigation. The only scale of health effect that is not currently recognized is near source exposure to transportation – living near highways, airports, diesel rail corridors. This exposure causes large health effects – cancer, cardiovascular diseases, etc. The statistical value of the increased mortality of living near highways and busy roadways exceeds the value of real estate. He recognized that moving people towards the core and cities are an answer to sustainability and climate change problems, but urged better solutions to pollutants in dense urban areas. In Somerville, there are two ordinances before the Board of Alderman on air filtration and housing.

Mr. Zamore expressed gratitude for the Green Line Extension and appreciated that MassDOT is not precluding the possibility of an extension from Union to Porter Square. He also expressed gratitude for the completion of the community path, noting the health benefits related to providing a space for cycling separate from vehicle traffic. He references the study of two Danish cities that he had mentioned last year, which found the value of exercise was undermined by air pollution, and that exercise also did not mitigate the damage of air pollution. Providing a space for active transportation on paths separate from busy arterials is a great approach. Mr. Zamore expressed hope that the Northern Strand path will get connected to Assembly Square and the Grand Junction to the Community Path.

Mr. Zamore then reflected on environmental justice (EJ) needs in Somerville and Chelsea, urging analysis to look at EJ at a granular, finer spatial level (Traffic Analysis Zone-level, for example) to look at disparities, since they do not appear at the regional level. He mentioned pollution of ultra-fine particles from aviation as a concern in Chelsea, due to its proximity to Logan Airport.

Mr. Zamore also discussed noise. The largest health effects are from very high sound levels, but noise annoyance is also a concern. He suggested considering the shared purchase of sound cancellation systems.

Finally, Mr. Zamore inquired about a land use study with the MPO and how to engage the public. He emphasized the importance of viewing land use, transportation, environment, and health as one continuum and the need for education on these topics.



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Date: September 24, 2018

To: Scott Hamwey, scott.hamwey@dot.state.ma.us
MassDOT, Office of Transportation Planning, Room 4150,
Ten Park Plaza
Boston, MA 02116

Sejal Shah, sejal.shah@state.ma.us
Mass DEP, Bureau of Air and Waste, One Winter Street, Boston, MA 02108
(by email)

Re: Comments on SIP Transit Commitments report, Supporting GLX and full CPX,
future Green Line Extension (GLX) possibilities from Union Square

To Scott Hamwey and Sejal Shah:

Thank you for this opportunity on behalf of the Friends of the Community Path to
comment on the annual State Implementation Plan (SIP) Transit Commitments
(deadline 5:00 pm today).

<https://www.mass.gov/files/documents/2018/08/02/SIP18ComStatReport.pdf>

We wholeheartedly thank the State for

1) Designing and building the full Community Path Extension (CPX) as part of the GLX from Lowell Street to 22 Water Street at the NorthPoint development, where the CPX will meet the bike/ped path through Cambridge Crossing (formerly) NorthPoint. The GLX -- a State project -- and the CPX -- a regional greenway project -- are intertwined, because they are in same location (the MBTA right-of-way) and both benefit each other.

2) Re-instituting (compared to the scaled-back, cost-savings plan) the 3 eliminated street connections, thereby significantly shortening the distance for ADA access to the CPX and stations. Additionally, the Medford St. connection to the CPX provides an ADA compliant route to the Gilman Square GLX station.

RE: GLX Project: We request that MassDOT/MBTA:

1. Mitigate the massive unselective razing of trees and vegetation in Somerville by the GLX project contractor. Not all of this tree-razing was necessary for construction)
2. Build the full GLX including to Route 16.
3. Implement additional interim offset measures for GLX delays, including free T-passes to all Somerville and Medford residents during the GLX bridge closures, and getting the simple but needed bike/ped easement from Cedar Street to Boston Avenue.
4. Fulfill its obligations to the SIP process and commitments
5. Ensure that the final design and construction of the GLX does not preclude future extension of the Union Square Green Line branch to Porter Square.

We discuss these first three points in detail below. We also support comments submitted by this week by Ken Krause of Medford.

1. Mitigation for GLX Tree Loss Far Exceeding MEPA Threshold for Review

Per Section 2b: 301 CMR 11.00: MEPA Regulations, the cutting of “five or more living public shade trees of 14 or more inches in diameter at breast height” meets the threshold for a MEPA review of projects that are likely, directly or indirectly, to cause Damage to the Environment. <https://www.mass.gov/regulations/301-CMR-1100-mepa-regulations>

In the last few weeks, hundreds (thousands, who knows?) of mature trees were unselectively razed along the GLX corridor. The caliper of many of these trees exceeded 14" in many of these trees.



We ask that the State assess the loss of trees and biomass here and mitigate the environmental damage by covering the cost of planting number similar of trees around Somerville to the number removed)in the corridor in preparation for construction.



2. Build the full GLX to Route 16

We enthusiastically support the completion of the Green Line Extension (GLX), the major remaining transit commitment that originated with the Big Dig and then became incorporated into the SIP at 310 CMR 7.36. GLX was planned right - Somerville has created density around the planned stations, which maximizes the Commonwealth's investment. There has been historic dis-investment in public transportation in MA and the Commonwealth needs to pursue important projects like GLX.

All GLX stations should be included, including the Route 16 station, which will serve Medford, Somerville, and E. Arlington, and links to the Alewife Brook/Mystic River paths.

Building the GLX to Route 16, as part of this legally mandated project, has been promised for decades. This extension must not get postponed while the State advances other multi-billion-dollar transit projects. The College Ave. terminus station does not

satisfy the SIP commitment because it does not extend service to what “Medford Hillside.

There are some new station design options proposed by Medford citizens that will make the GLX extension to Route 16 more affordable and will require less impact of the community. Please work with these Medford citizens to advance a cost-effective station design at Route 16.

3 Recommending Additional Interim Offset Measures for GLX Delays

As the GLX opening will be delayed beyond its current legal deadline (and perhaps delayed even further than expected), we suggest the following interim projects that in the corridor to more fully make up for the delayed environmental benefits.

Remember -- there are no parking garages being built as part of the GLX, and in fact, the community wanted the full CPX to be built instead of parking – which is much less expensive than the cost of building parking garages.

1. Recommending that MassDOT/MBTA design and construct a GLX Twin Cities path spur/connection from the CPX to Twin Cities Plaza, because the air quality benefits of this path to path connection are permanent, with *long-term* rather than just temporary air quality benefits.

This short Twin Cities path spur to the Grand Junction Path can act as a stand-alone project, connecting this area of Somerville and East Cambridge to the CPX, or may someday connect to the Grand Junction Path across Cambridge (parts of which are already being built) and into Allston.

<https://www.facebook.com/GrandJunctionPath/photos/pb.527208230634027.-2207520000.1447944954./698715343483314/?type=3&theater>

1. **Provide free MBTA transit passes and BlueBike use programs during the delay.** This will also provide a financial incentive for timely project completion. It will be most important to add share bike service in East Somerville, Winter Hill (near Mystic Housing) and at the new Assembly Square T station where there are no Blue Bike stations.
2. **Reject any additional diesel rail stops on commuter rail lines** through the area. Diesel rail pollutes communities most during when starting from a stop. Diesel emissions were just classified by WHO as a Class 1 carcinogen just like smoking and asbestos. This is both a serious occupational and adjacent community issue.
3. **Designate new cleaner diesel commuter rail locomotives to the GLX corridors.** These locomotives, which will replace half of those currently in service, are in the process of being delivered and deployed by the MBTA.

Diesel fueled transportation is a major contributor to atmospheric black carbon, the most important short-lived climate pollutant and a direct cause of lung cancer.

4. State Process and Commitments

We support all of the recommendations made in the comment letter by Ken Krause, namely that

1. MassDEP should instruct MassDOT to abide by its stated commitment to properly characterize the nature of the reprogrammed MPO money in all SIP documents.
2. MassDEP should require MassDOT to fulfill its commitment to completing the Route 16 EIR in a timely fashion, provide updates to MassDEP on its progress, and report to MassDEP on its findings and conclusions, including in the Status Report.
3. MassDEP should require MassDOT and the MBTA to present a detailed analysis of the effectiveness of the interim offset projects in the Status Report on the Transit Commitments due each July 1, and to reconsider and provide alternative interim offset projects if the ones in place are not achieving the required emission reductions.

Thank you for balancing many interests and for your consideration of this public comment. The entire state (and beyond) will benefit from these sustainable transportation projects and the healthier urban neighborhoods and regional economy they will support. The timely completion of these projects will:

- Advance the MassDOT's Mode Shift goal of tripling the bicycle, pedestrian, and transit mode share by the year 2030
- Advance MassDOT objectives of greenhouse gas emission reductions within the transportation sector, as required under the Commonwealth's Global Warming Solutions Act.
- Serve as a model for 21st century urban transportation for the whole state.

Sincerely,

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

TO: scott.hamwey@dot.state.ma.us, sejal.shah@state.ma.us

CC: mayor@somervillema.gov, tbennett@cambridgema.gov, Jon.Lenicheck@mail.house.gov, ayanna.pressley@boston.gov, Patricia.Jehlen@state.ma.us, jarred.rose@masenate.gov, denise.provost@mahouse.gov, mike.connolly@mahouse.gov, Jordan.Neerhof@mahouse.gov, William.Sutton@mahouse.gov, Christine.Barber@mahouse.gov, Claire.Teylouni@mahouse.gov, Sal.DiDomenico@masenate.gov, Paul.Donato@mahouse.gov, Sean.Garballey@mahouse.gov, matthew.hartman@masenate.gov, john.rosenberry@mahouse.gov, speterson@ctps.org, cclaude@ctps.org, tsnyder@somervillema.gov, mglavin@somervillema.gov, BRawson@somervillema.gov, gproakis@somervillema.gov, mayor@cambridgema.gov, wdeignan@cambridgema.gov, lpeterson@cambridgema.gov, rrossi@cambridgema.gov, jalves@cambridgema.gov, ttoomey@cambridgema.gov, boardofaldermen@somervillema.gov, mackey@somervillechamber.org, reneetscott@gmail.com, wlandman@walkboston.org, bkearney@walkboston.org, bsloane@walkboston.org, grandjunctionpath@gmail.com, mark.e.chase@gmail.com, dcarr@cube3studio.com, EBourassa@mapc.org, tobrien@hyminvestments.com, denison@gmail.com, kara@livablestreets.info, steve@livablestreets.info, jackie@livablestreets.info, snutter@gmail.com, bikeinfo@massbike.org, richard@massbike.org, info@somervillebikes.org, bostongreenroutes@somervillebikes.org, jason@bostoncyclistsunion.org, bwolfson@bostoncyclistsunion.org, TReardon@mapc.org, kencarlson8@gmail.com, kegan@t4ma.org, cticotsky@t4ma.org, jostroff@t4ma.org, jlauspitz@comcast.net, arondon@ma-smartgrowth.org, andre@ma-smartgrowth.org, leeann@railstotrails.org, craig@greenwaysolutions.org, info@eastcambridgeplanningteam.org, jeremy@transitmatters.info, tkaplan@gbls.org, reishere51@gmail.com, wigzamore@gmail.com, kmolloy@gmail.com, kenneth.krause@comcast.net, alan@pathfriends.org, jonah@petri.us, friendspath@yahoo.com



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JOINT COMMITTEE ON EDUCATION

JOINT COMMITTEE ON LABOR AND
WORKFORCE DEVELOPMENT

September 24, 2018

Scott Hamwey

MassDOT Office of Transportation Planning

Room 4150, Ten Park Plaza

Boston, MA 02116

Sejal Shah

MassDEP, Bureau of Air and Waste

One Winter Street

Boston, MA 02108

Dear Mr. Hamwey and Ms. Shah,

Thank you for the opportunity to submit comments on the 2018 Transit Commitments Status Report to the Massachusetts Department of Environmental Protection (DEP), submitted by the Massachusetts Department of Transportation (MassDOT) in conjunction with the Massachusetts Bay Transportation Authority (MBTA) on July 3, 2018.

This project has come a long way over the many years of envisioning, debate, set-backs, and successes. This year's progress on implementing Phase 1 of the extension is unprecedented in the history of the project. I am hopeful that we can all take advantage of cleaner air throughout Somerville, Medford, and Cambridge in near future.

I have one comment to convey at this point in response to this year's Status Report.

Measurement of Interim Offsets Impact

In response to last year's report my legislative colleagues and I suggested that MassDOT measure the effectiveness of the interim offsets required by the SIP process. MassDOT commented in response that it

“has not analyzed the air quality benefits of the interim mitigation measures since they were put in place,” and left no indication that it would do so. This year’s updated report includes no information that they have performed any evaluation. In addition, we requested that MassDOT explore additional offsets to ensure that the impacted communities were truly going to see reductions in harmful particulates promised by the plan. MassDOT responded that it “does not believe that additional increases in corridor bus service are necessary to meet the interim mitigation requirement.”

I am confused at how MassDOT came to the conclusion that the further offsets were not necessary when it admits that it has done nothing to examine the impact of the currently implemented temporary offsets. While I understand that some assumptions in the initial calculation of the offsets may not have changed, many can now be confirmed by actual real time information about usage of buses, reduction in car usage evidenced by traffic reductions, increases or decreases in traffic standing time, or any other variety of ways that MassDOT and DEP may see fit to test the assumptions made in adopting the temporary offsets.

Request: I again request that DEP require that the current offsets be examined for validity and effectiveness, and that MassDOT be required to propose and implement any necessary additional offsets should the current offsets prove to be falling short of expectations.

Thank you again for offering the opportunity to provide feedback.

Sincerely,



Senator Patricia D. Jehlen
Second Middlesex

Kenneth J. Krause
50 Mystic Street Medford, MA 02155
781-396-0920 kenneth.krause@comcast.net

September 25, 2018

Scott Hamwey
MassDOT Office of Transportation Planning
Room 4150, Ten Park Plaza
Boston, MA 02116

Sejal Shah
MassDEP, Bureau of Air and Waste
One Winter Street
Boston, MA 02108

Dear Mr. Hamwey and Ms. Shah,

Thank you for the opportunity to comment on the 2018 Status Report for State Implementation Plan – Transit Commitments, submitted by the Massachusetts Department of Transportation (MassDOT) and the Massachusetts Bay Transportation Authority to the Massachusetts Department of Environmental Protection (MassDEP) on July 3, 2018.

My comments pertain to the Green Line Extension (GLX) to Somerville and Medford, with which I have been engaged as an interested citizen and advocate since serving on the Beyond Lechmere Northwest Corridor study advisory group in 2004-05.

I am pleased that the design-build entity GLX Constructors was given the notice to proceed in December 2017 and has commenced with getting early construction work underway. The forecast for the start of revenue service on the Union Square Branch by late April 2021 and the Medford Branch by July 2021 is encouraging, and I hope that schedule can be maintained. I am also pleased that GLX Constructors is holding monthly meetings of a GLX Working Group comprised of community members and other stakeholders.

I am concerned about certain statements and omissions from the Status Report that should receive attention and action from MassDEP:

Project Description: Mischaracterization of Measures to Close Funding Gap

Last year, I noted in my comment letter that the SIP Status Report should state that the \$157 million that the Boston Metropolitan Planning Organization (MPO) contributed to GLX Phase 1 was a reprogramming of funds from GLX Phase 2. In MassDOT's response to the public comments, submitted on February 14, 2018, by David Mohler, executive director of the Office of Transportation Planning, the agency wrote: "Going forward, MassDOT will state in all SIP documents that, in 2016, the Boston Regional Metropolitan Planning Organization reprogrammed funds that were initially programmed to construct an additional extension of the

Green Line to Route 16 in order to help close a funding gap in the core Green Line Extension project.” However, this year’s Status Report included no such language.

Recommended action: *MassDEP should instruct MassDOT to abide by its stated commitment to properly characterize the nature of the reprogrammed MPO money in all SIP documents.*

Project Description: Omission of/Lack of Progress on Route 16 Station EIR

As a condition of the MPO reprogramming the \$157 million from GLX Phase 2 to GLX Phase 1, MassDOT committed to completing a Final Environmental Impact Report on the Route 16 Station, and to initiate the Massachusetts Environmental Policy Act (MEPA) process by December 31, 2016. The initial MEPA filing occurred 10.5 months late, on October 17, 2017, and public comments were accepted until December 12, 2017. Ten day later, the Secretary of Energy and Environmental Affairs issued the Certificate on the NPC in which he determined that a Supplemental Environmental Impact Report (EIR) was required. The scope of the EIR outlined in the certificate requires MassDOT to examine two station alternatives at Route 16, one in which the existing U-Haul building is demolished to make way for the station, and one in which the U-Haul building is preserved. The certificate also requires MassDOT to perform a qualitative assessment of water quality benefits of GLX Phase 2 on the Mystic River. These are two significant aspects of the project that were not evaluated in the previous environmental study of the Route 16 station and will provide valuable information regarding both the negative and positive environmental impacts of GLX Phase 2.

However, fully nine months after the certificate was issued, MassDOT has not initiated the Environmental Impact Report study process. This lack of progress should be noted in the SIP Status Report, as while the EIR is not part of the SIP agreement to extend the GLX to “Medford Hillside,” it was a condition of the MPO’s reprogramming the GLX Phase 2 funds to GLX Phase 1, which allowed the core project (required by the SIP) to resume after a 2016 pause.

Recommended action: *MassDEP should require MassDOT to fulfill its commitment to completing the Route 16 EIR in a timely fashion, provide updates to MassDEP on its progress, and report to MassDEP on its findings and conclusions, including in the Status Report.*

SIP Requirement Status: Interim Offset Projects

Because it failed to meet the legal requirement to extend Green Line service to “Medford Hillside” by December 31, 2014, MassDOT was required by that date to implement interim offset projects that provide emission reductions “equal to or greater than the Green Line Extension itself.” MassDEP approved these interim projects on July 16, 2015. However, no information is provided in the Status Report on whether they are providing the reductions of NMHC, CO, and NOx equal to or greater than the reductions projected for the GLX itself. Nor is there any indication of MassDOT having any intent or procedure to analyze and report on their effectiveness.

In the agency’s response to an similar comment on the 2017 Status Report, MassDOT acknowledged that it “has not analyzed the air quality benefits of the interim mitigation measures since they were put in place,” but gave no indication that it ever intends to do so.

Recommended action: MassDEP should require MassDOT and the MBTA to present a detailed analysis of the effectiveness of the interim offset projects in the Status Report on the Transit Commitments due each July 1, and to reconsider and provide alternative interim offset projects if the ones in place are not achieving the required emission reductions.

Thank you for your consideration of these comments.

Sincerely,



Ken Krause
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cc: Martin Suuberg, Commissioner, MassDEP
Christine Kirby, MassDEP
Stephanie Pollack, Secretary of Transportation
David Mohler, MassDOT Planning and Boston Region MPO
Luis Ramirez, MBTA General Manager