



Town of Arlington

Adam W. Chapdelaine
Town Manager

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April 25, 2022

David Mohler
Chair, Boston Region Metropolitan Planning Organization
10 Park Plaza, Suite 2150
Boston, MA 02116
Via email: mgenova@ctps.org

RE: Comment on FFYs 2022-2026 TIP Amendment Three

Dear Mr. Mohler,

I am writing on behalf of the Town of Arlington regarding Amendment Three to the Boston Region MPO FFYs 2022-2026 Transportation Improvement Program (TIP) and the reallocation of the Green Line Extension (GLX) funding in FFY 2022.

The Town has long supported the GLX and greatly appreciates the ongoing support of the MPO for the GLX over the years, in particular for a terminus at Route 16/Mystic Valley Parkway, part of the original preferred design for the GLX. With the opening of the GLX Phase I recently in Union Square and later this summer to College Avenue, this last stop serves a number of state-designated environmental justice communities facing intense traffic congestion. A Route 16 terminus connects the greater region to an accessible transit option for thousands of people in the Medford, Arlington, and Somerville areas and beyond.

As you know, the MPO previously programmed \$150M in funds for the Route 16 stop. In 2016, during the "GLX reset," the MPO voted to reprogram the funds to support the GLX Phase I, now nearly completed and on-budget. In the MPO vote, then-Secretary Pollack committed to the MPO to complete the environmental impact review for the Phase II/Route 16 stop. A notice of project change was filed in 2017, but the review process has not yet begun.

As the MPO votes on Amendment Three for the FFYs 2022-2026 TIP, the time is now to move this process forward. We request that MassDOT either formally request MPO funding for GLX Route 16 planning and permitting *or* designate specific MassDOT budget funds for this purpose as part of the 2023-2027 TIP. Furthermore, we request that MassDOT immediately publish a draft scope of work for this planning and permitting effort and meet with the regional coalition of stakeholders to review it. We request that a scope be finalized and funded, and that consultant work be authorized by September 1, 2022.

Thank you to the MPO for its support, and we urge this group to ensure the commitments made are met.

Sincerely,

A handwritten signature in blue ink, appearing to read "Adam Chapdelaine".

Adam Chapdelaine
Town Manager

Boston Region MPO



THE GENERAL COURT OF MASSACHUSETTS
STATE HOUSE, BOSTON 02133-1053

April 27, 2022

RE: MPO Action Item on FFY 22-26 TIP Amendment Three

Dear MPO Board;

As the state legislative delegation for the Green Line Extension corridor, we are writing in regards to your upcoming vote on Amendment 3 to the 2022-26 Transportation Improvement Plan (TIP) regarding the GLX.

We greatly appreciate the MPO's ongoing support for the Green Line Extension over many years, in particular for a stop at Route 16/Mystic Valley Parkway, the original preferred design for the GLX. With the recent opening of the GLX Phase I to Union Square and later this summer to College Avenue, this is the time to address planning for Phase II, the Mystic Valley Parkway/Route 16 stop, which would serve a number of state-designated environmental justice communities. Phase II would connect thousands of people in Medford, Arlington, and Somerville to accessible transit and can provide a model for successful regional partnerships for mobility infrastructure.

As you know, the MPO previously programmed \$150M in funds for the Phase II stop. In 2016, during the "GLX reset," the MPO voted to reprogram the funds to support the Phase I GLX project, now nearly completed and on-budget. In the MPO vote, then-Secretary Pollack committed to the MPO to complete the environmental impact review for Phase II. MassDOT filed a notice of project change in 2017, but the review process has not yet begun.

As the MPO votes on Amendment 3, the time is now to move this process forward. It was a great success that the GLX Phase I was built within its budget, and we now have the opportunity to fulfill the commitments made in 2016.

We request that MassDOT formally request MPO funding for GLX Phase II to Route 16 planning and permitting *or* designate specific MassDOT budget funds for this purpose during the 2023-2027 TIP public comment period. Furthermore, we request that MassDOT immediately publish a draft scope of work for this planning and permitting effort, and meet with

the regional coalition of stakeholders to review it. **We request that a scope be finalized and funded, and that consultant work be authorized by September 1, 2022.**

Thank you to the MPO for your support, and we urge this group to ensure the commitments made are met.

Sincerely,

Christine Barber
State Representative
34th Middlesex District

Patricia Jehlen
State Senator
2nd Middlesex District

Sean Garballey
State Representative
23rd Middlesex District

Dave Rogers
State Representative
24th Middlesex District

Paul Donato
State Representative
35th Middlesex District

Cindy Friedman
State Senator
4th Middlesex District

April 27, 2022

To Matt Genova, TIP Manager, and the members of the Boston Region Metropolitan Planning Organization:

As a resident of Medford Hillside for 35 years and a supporter of the Green Line Extension since first hearing about the project in October, 2006, I am writing to comment on Amendment Three's removal of the MPO's \$27,116,883 in funding for the Green Line Extension project in FFY 2022 (S10780) and proposed use of reallocated Green Line Extension funds to an unrelated project.

While I can't know the constraints on MPO's processes dictating allocation of funds at any particular point in time, I urge the MPO to find any possible opportunity to complete the State's obligation to fund the Green Line Extension to Medford Hillside (i.e., Route 16/Mystic Valley Parkway) as soon as humanly possible.

It was a great achievement when MassDOT (then called EOT) in 2009 settled on the Extension to Route 16/Mystic Valley Parkway as the Preferred Alternative among several others studied, and detailed the many benefits of that alternative, which have been extensively documented. (For example, see the 2012 Metropolitan Area Planning Council report from its visioning study at http://www.mapc.org/wp-content/uploads/2017/11/Final_Report_forweb.pdf, appendices at http://www.mapc.org/wp-content/uploads/2017/11/Green_Line_report_Appendices.pdf.) Support for the Preferred Alternative from residents of Medford, Somerville, Arlington and beyond was documented in a 2008 petition that garnered over 2,000 signatures and comments.

Massachusetts was legally obligated to extend the Green Line to Medford Hillside* as stated in a SIP amendment approved by the EPA in October of 2007, with a deadline of opening to passenger service by December 31, 2014. (That date was already an extension from a 2011 deadline, with the need for the extension having been identified in the 2005 Beyond Lechmere Northwest Corridor Study, along with earlier discussions and studies dating back to the 1970's.)

It was a huge disappointment when the Green Line Extension was split into two phases in 2015, and an even bigger blow when the MPO reprogrammed \$152.1 million in funds for Phase 2 (the last mile, to Route 16/Mystic Valley Parkway) to Phase 1 under threat of the GLX project being cancelled altogether and hundreds of millions of dollars in planning wasted.

To soften the blow, then Secretary of Transportation Stephanie Pollock wrote a letter to then Medford Mayor Stephanie Muccini Burke committing "to continue planning for the Green Line Extension (GLX) to Route 16/Mystic Valley Parkway" and "to carry the MEPA process through to a Final Environmental Impact Report, and issuance of final certificate, so long as we continue to advance the Lechmere to College Ave. portion of the GLX project." This letter is attached and I hope you will read it in its entirety.

The regional benefits to air quality, environmental justice, transit-oriented development, and more of bringing the Green Line Extension to Route 16/Mystic Valley Parkway merit MPO funding, and I hope you will incorporate it into your planning as soon as possible. If any remaining GLX Phase 1 funds need to be reallocated, they should go to GLX Phase 2, not to an unrelated project.

Many thanks for your consideration of these comments,

Elisabeth Bayle

Medford Hillside resident

* The College Ave. station, the current temporary terminus of the Green Line Extension, is not in Medford Hillside, as documented at <https://app.box.com/shared/t499nbn0a8> and <https://app.box.com/s/v0128xso4l2tpl8tkc7o>, and

explained in the attached letter from Rafael Mares of the Conservation Law Foundation dated September 16, 2016 to Martin Suuberg at DEP commenting on the 2016 SIP Status Report which contained an unfortunate error by Laurie Burt of MassDEP in a letter in Attachment 5 to the Notice of Project Change. The considerable disadvantages of College Ave. as a terminus and regional advantages of a Route 16/Mystic Valley Parkway terminus have been detailed elsewhere.

September 16, 2016

VIA EMAIL

Martin Suuberg
Commissioner
Department of Environmental Protection
One Winter Street
Boston, MA 02108

RE: 2016 State Implementation Plan Transit Commitments Status Report

Dear Commissioner Suuberg:

The Conservation Law Foundation (“CLF”) has reviewed the State Implementation Plan (“SIP”) Transit Commitments Status Report filed on June 30, 2016 (“2016 SIP Status Report”). This past year been another tumultuous year for the SIP transit commitments. We are pleased that the Commonwealth continues to advance SIP projects but remain concerned about the continued estimated project delays and the lack of sufficient expenditure of funds to ensure that all of the remaining SIP projects are completed as soon as possible. CLF celebrates the long-awaited opening of the modernized Government Center station as part of the SIP-required Blue Line Platform Lengthening and Station Modernization earlier this year and appreciates the Commonwealth’s efforts to overcome the most recent challenges of the Green Line Extension Project. The Commonwealth’s legal obligation to complete all of the SIP projects is binding under the federal Clean Air Act and pursuant to the settlement agreement in *CLF v. Romney et al.*, United States District Court for the District of Massachusetts, Civil Action No. 05-1048 (hereinafter, *CLF v. Romney*); the projects are crucial to achieving attainment of ambient air quality standards, and are vital to the health and mobility of the area’s residents.

The SIP requires that status reports be filed annually to ensure that projects do not fall behind schedule and the necessary steps are taken so that compliance with the Clean Air Act is not delayed in the event that challenges arise. We urge the Massachusetts Department of Transportation (“MassDOT” or “Department”), the Massachusetts Department of Environmental Protection (“DEP”), and the U.S. Environmental Protection Agency (“EPA”) to take all necessary actions to respond to the remaining delays, reduce them, and avoid the need for additional future delays. This should include the provision and implementation of detailed and expedited project schedules, and, where necessary and permissible, identification and implementation of further interim emission reduction offset projects or measures. See 310 CMR 7.36(4). More detailed comments on each of the projects discussed in the SIP Status Report and the ones for which reports are required but missing are provided below.

Green Line Extension

Over the last year, the Commonwealth made significant progress in getting the Green Line Extension project back on track. CLF was pleased that in May of 2016 the MassDOT Board and the MBTA's Fiscal and Management Control Board voted to seek approval from the Federal Transit Administration (FTA) for the release of New Starts funding designated for the project. The Green Line Extension, however, continues to be significantly delayed and the 2016 SIP Status Report does not provide an estimate for an opening of the extension, as is required by the SIP. Such an estimate should be provided, and other dates for milestones, should be shared with the public as part of the report.

Even before the most recent setback, the Green Line Extension project was delayed. The current SIP requires completion of the project by December 31, 2014. As a result, the Commonwealth is required to implement interim offset projects or measures, which are required to achieve emissions reductions equal or greater than the emissions reductions that would have been achieved had the project not been delayed. See 310 C.M.R. 7.36(4)(b). To this end, MassDOT has proposed and implemented additional off-peak bus service along existing routes serving the GLX corridor as well as a 20% increase in off-peak Green Line service to Lechmere Station. Additionally, MassDOT has purchased 142 new hybrid electric vehicles for The RIDE. Finally, MassDOT seeks to achieve significant portion of the air quality benefits required during the delay of the GLX through park and ride spaces at the Salem and Beverly intermodal facilities.

CLF has previously commented that while all of these measures are beneficial transit projects, they do not all meet the requirements for interim offset projects and measures as defined by the SIP. Please see CLF's comment letter on MassDOT's petition to delay dated October 6, 2014 for more details. Regardless, the 2016 SIP Status Report does not clearly mention that all of these interim offset projects and measures have been implemented, rather it just states that they have been proposed and approved by DEP and that "they will remain in place for as long as necessary." See 2016 SIP Status Report, p. 15. The SIP status reports should state clearly that these interim projects and measures have been implemented and provide details of when the increased service on the bus routes and Green Line is currently provided and how many park and ride spaces have been added.

Also, now that these projects and measures have been in place for more than 20 months, the Commonwealth should assess whether they are producing the expected air quality benefits. If they are not, adjustments should be made. In this context, it bears noting that the Salem and Beverly parking facilities since opening up in 2014 have experienced utilization rates much lower than assumed for the calculation of the air quality benefits. The Central Transportation Planning Staff assumed two years ago that the two garages would have utilization rates of 80% in 2015¹, but the

¹ Central Transportation Planning Staff, *Technical Memorandum: Air-Quality Interim Offset Measures Results and Methodology*, p.6 (July 25, 2014) at

actual Salem and Beverly occupancy rates of 57% and 52% in FY15 and approximately 75% and 51% in FY16², respectively, were much lower. As a result, additional interim offset projects and measures should be required and implemented without delay.

Additionally, CLF continues to be troubled by the segmentation of the Green Line Extension project. To comply with the SIP, MassDOT must construct an extension of the Green Line “from Lechmere Station to Medford Hillside” by December 31, 2014. See 310 C.M.R. 7.36(2)(j)1. The Green Line Extension Project, as described in the 2016 SIP Status Report, does not comply with the SIP, since Medford Hillside’s well-documented historical boundaries do not include the location of the proposed terminus at the intersection of College Avenue and Boston Avenue.³ The Route 16 terminus, which is being pursued separately by MassDOT, will produce an estimated reduction in VMT of more than ten percent of the project. It also will provide fair and equitable access to transit—and thus to increased economic and educational opportunities—to five additional state-defined environmental justice communities (two in Somerville, two in Medford, and one in Arlington). A terminus at Route 16 will fulfill the SIP requirement to extend the Green Line to the Medford Hillside. As previously programmed funding for this segment of the Green Line Extension has recently been repurposed to support the remainder of the extension, the Commonwealth should report on how it will now fund this essential part of the project. As an aside, any interim offset project or measure implemented for the delay of the project should include the full air quality benefits expected from the extension to Route 16.

Finally, while the extension of the Somerville Community Path is not required by the SIP, CLF appreciates that it remains a part of the Green Line Extension Project. The most recent redesign of the Community Path Extension (CPX), however, omits a critical 3,100-foot section that will require pedestrians and cyclists to use existing busy streets and decrepit sidewalks along a fast, polluted McGrath highway, in an environmental justice neighborhood (East Somerville)—instead of connecting this leg of the CPX from Washington Street to the existing North Point path in Cambridge leading to the Charles River paths. Therefore, CLF urges MassDOT to complete the full and fully-off-road two-mile CPX, in order to provide primary, ADA-compliant pedestrian and bicycle access to four Green Line Extension stations (rather than only three, as

https://www.massdot.state.ma.us/Portals/17/docs/sip/AirQualityMeasures_2014_04_17.pdf (last viewed September 25, 2015).

²MBTA, *MBTA Parking Updates: FMCB Presentation* (May 16, 2016), p. 12.

http://www.mbta.com/uploadedfiles/About_the_T/Board_Meetings/Parking%20Strategy_UPDATED_5_13_2016_1511.pdf

³ For a more detailed explanation of this issue, please see CLF’s comments on the Draft and Final Environmental Impact reports for the project available at

http://www.greenlineextension.org/documents/FinalEIR/Vol2and3/71_GLX_FEIR_V2_CommOrg3of5_20100615.pdf and at http://www.greenlineextension.org/documents/FinalEIR/certificate/FEIR_CommentsPart4.pdf respectively. http://www.greenlineextension.org/documents/FinalEIR/Vol2and3/71_GLX_FEIR_V2_CommOrg3of5_20100615.pdf and at http://www.greenlineextension.org/documents/FinalEIR/certificate/FEIR_CommentsPart4.pdf respectively.

currently redesigned) that will also double as emergency egress for two of the stations. A full CPX will also connect the Minuteman Bikeway and to the paths along the Charles River, thus knitting a network of approximately 48 miles of continuous shared use paths, linking 11 municipalities. The Metropolitan Area Planning Council has estimated three million trips per year via the completed CPX.

Fairmount Line Improvement Project

Although many aspects of the Fairmount Line Improvement project have now been completed, which CLF greatly appreciates, unfortunately, one station continues to be delayed. While five years ago the MBTA anticipated construction of the Blue Hill Avenue Station to start by May of 2012, and last year predicted an opening date of December 2018, this year's update only states that the MBTA anticipates a bid date of mid-September 2016, with no date for the beginning of construction or completion provided. See 2016 Status Report at 4. While CLF understands the nature of the challenges the MBTA and MassDOT have experienced in this area, we expect, and the public deserves, a more concrete timeline for the completion of the final station from here on out. CLF appreciates that, in response to the this delay, MassDOT continues to run two interim offset measures: shuttle bus service from Andrew Square to Boston Medical Center and increased weekday bus service on the Route 31 bus which serves Mattapan and Dorchester. CLF also appreciates the MBTA's efforts to increase the frequency of service on the Fairmount Line through the introduction of refurbished commuter rail locomotives and coaches as shorter train sets will be an important further step forward in the direction of creating an affordable and practical transportation alternative for residents in the corridor. Such increased service will help meet the SIP requirement to "improve service and increase ridership" on the Fairmount Line. This important project should be mentioned in the status report.

Construction of 1,000 New Parking Spaces

MassDOT failed to include the 1,000 new parking spaces required by the SIP in its 2013, 2014, 2015, and 2016 status reports. While MassDOT has succeeded in bringing this SIP requirement close to completion, there have been significant changes since MassDOT stopped reporting and there is some potential of further changes. As a result, DEP should require MassDOT to continue reporting on this requirement until the full accounting of parking spaces is settled.

Until three years ago, 102 surface parking spaces in Beverly that MassDOT counted towards fulfilling of this requirement have been eliminated and were replaced with parking spaces in the new garage, which opened on August 2, 2014. MassDOT has never reported on this development as part of a SIP annual update.

Likewise, in response to CLF’s comments, MassDOT provided more details of an agreement that specifies the number of spaces that will be available for transit users at South Garage adjacent to Wonderland Station. The MBTA has guaranteed the City of Revere access to additional parking spaces in South Garage, in furtherance of the Waterfront Square development at Revere Beach, that if exercised would reduce the spaces available for satisfying the SIP commitment from 612 to 271 or less. MassDOT has provided no details on how the loss of over three hundred parking spaces would be compensated.

We therefore urge DEP to require MassDOT to continue reporting on this requirement in SIP status updates until there is full clarity that it has been completed and how it has or will be satisfied.

Blue Line Platform Lengthening and Station Modernization

MassDOT failed to include the Blue Line Platform Lengthening and Station Modernization project in its 2012, 2013, 2014, 2015, and 2016 status reports. CLF disagrees with MassDOT’s continued claim that its obligations under this SIP commitment were completed by virtue of implementing six-car train service despite the failure to modernize all Blue Line stations. The SIP requires both Blue Line platform lengthening *and* station modernization. See 310 CMR 7.36(2)(g) (“Before December 31, 2008, construction of the following facility shall be completed and opened to full public use: Blue Line Platform Lengthening *and* Modernization.” (emphasis added)). MassDOT’s failure to report on this commitment therefore violates the law. Furthermore, both components of this project are necessary to achieve the increased ridership and attendant improved air quality required under the Clean Air Act through the SIP. Increased ridership is a function of available capacity, access, and attractiveness of service. Modernization of old, inaccessible, uncomfortable, and otherwise non-user friendly stations and facilities leads to increased ridership and thus to improved air quality.⁴ DEP should therefore require a status update in this report. Considering this year’s opening of Government Station, it would provide a reason to boast.

Red Line/Blue Line Connector

On December 8, 2015, the EPA published a final rule in the Federal Register approving a SIP revision submitted by the Commonwealth that removes the design of the Red/Blue Line Connector project as a requirement. CLF opposed this revision due to reasons stated in previous

⁴ See, e.g., Stacey Falzarano, Richard Hazlett, and Thomas Adler, *Quantifying the Value of Transit Station and Access Improvements for Chicago’s Rapid Transit System* (Transportation Research Board Paper No. 01-2987, Jan. 2001).

comments. Regardless of the SIP revision, the Commonwealth should advance this important project.

Conclusion

The continued projected delays and the insufficient interim offset measures for the Green Line Extension, the delayed construction of one new station on the Fairmount Line, the failure to report on the 1,000 additional park and ride parking spaces serving commuter transit facilities and the Blue Line Platform Lengthening and Modernization raise serious concerns regarding the lawfulness of MassDOT's activities and its compliance with the SIP. DEP must therefore provide greater oversight and order MassDOT to comply with all the requirements of the SIP and MassDOT must allocate all needed funding and take all necessary steps to complete the SIP commitments as quickly as possible.

Thank you for the opportunity to comment.

Sincerely,



Rafael Mares
Vice President and Program Director,
Healthy Communities and Environmental Justice

cc

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

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



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



May 4, 2016

Mayor Stephanie Muccini Burke
Medford City Hall
85 George P. Hassett Drive, Room 202
Medford, MA 02155

Dear Mayor Burke,

This letter outlines my commitment to continue planning for the Green Line Extension (GLX) to Route 16/Mystic Valley Parkway in Medford. By the end of calendar 2016, MassDOT will initiate the Massachusetts Environmental Policy Act (MEPA) process by filing an Environmental Notification Form (ENF) for the extension of the Green Line from College Avenue to Route 16. We further commit to carry the MEPA process through to a Final Environmental Impact Report, and issuance of final certificate, so long as we continue to advance the Lechmere to College Ave portion of the GLX project.

I understand the desire by supporters of the Route 16 extension to keep the \$152.1 million currently programmed in the Boston Metropolitan Organization (Boston MPO) FFY 2016-2020 Transportation Improvement Program (TIP). Unfortunately, projected cost increases have forced the MassDOT Board and MBTA Fiscal Management and Control Board to reconsider the first phase of the GLX project, which only extends to College Avenue in Medford. I am hopeful, therefore, that the Boston MPO affirmatively moves those funds into the first phase of GLX so that more of the needed funding is available to bring the extension to College Avenue. Unless we reach College Avenue, there is no possibility of reaching Route 16.

If phase one of the GLX moves forward into federal approval, procurement, and a successful public bidding process, I commit to funding the necessary environmental and engineering analysis to understand the Route 16 extension's impacts, ridership, alignment, right-of-way needs, and cost estimate. I further commit to explore funding alternative during this process.

Before filing the ENF, I commit to meeting with you and other stakeholders to discuss the planning that has been conducted to date for the Route 16 extension, aspects of the extension that will be studied as part of the MEPA process, and a preliminary cost estimate.

Sincerely,

Stephanie Pollack

Ten Park Plaza, Suite 4160, Boston, MA 02116
Tel: 857-368-4636, TTY: 857-368-0655
www.mass.gov/massdot

April 27, 2022

Via Online Comment and E-mail

Tegin Teich, Executive Director, tteich@ctps.org
Matt Genova, Manager, mgenova@ctps.org
Boston Region MPO CTPS
State Transportation Building
10 Park Plaza, Suite 2150
Boston, MA 02116

Subject: Comment on Amendment Three, Transportation Improvement Program: FFYs 2022-26

Dear Ms. Teich and Mr. Genova:

Conservation Law Foundation (“CLF”) appreciates this opportunity to provide feedback on the proposed Amendment Three to the Transportation Improvement Program (“TIP”) for Federal Fiscal Years (“FFYs”) 2021-25.¹ CLF is disappointed to see the removal of the Somerville-Medford Green Line Extension Project, Extension to College Avenue with the Union Square Spur.² Project S10780, Regional Target Highway Program, was allocated \$27,116,883 for FFY 2022, which is now proposed to be eliminated to \$0, because the MPO proposes that “funding is no longer needed to close out construction.”

The Green Line Extension (“GLX”) to Medford is one of many binding commitments included in the Memorandum of Understanding (“MOU”) between Massachusetts and CLF resulting from litigation over the Big Dig project over thirty years ago. Those MOU commitments, including completion of GLX to Medford Hillside by 2014, were then incorporated into Massachusetts’s State Implementation Plan (“SIP”) and thus enforceable Clean Air Act commitments.³ However, after years of delays, groundbreaking for Phase I of the project occurred in 2018. Phase I of the

¹ CLF is a non-profit, member-supported organization dedicated to protecting New England’s environment. CLF protects New England’s environment for the benefit of all people and uses the law, science, and the market to create solutions that preserve our natural resources, build healthy communities, and sustain a vibrant economy. CLF has a long history of advocating for transportation systems that are accessible, reliable, efficient, affordable, and free of air pollution and greenhouse gas emissions.

² FFYs 2022-26 Transportation Improvement Program (TIP), Amendment Three, <https://www.ctps.org/data/pdf/plans/TIP/FFYs-2022-2026-TIP-Amendment-Three-Simplified.pdf>.

³ 310 CMR 7.26(2)(i)(1); See also Transportation Improvement Program, FFYs 2021-25 at 5-6, <https://www.ctps.org/data/pdf/plans/TIP/FFYs-2021-2025-Draft-TIP-Public-Review.pdf>.

GLX involves the extension of the Green Line from Lechmere Station in Cambridge to College Avenue in Medford, with a spur to Union Square in Somerville.

Phase II of the GLX involves the further extension of the Green Line from College Avenue to Route 16/Mystic Valley Parkway in Somerville. As Phase I of GLX is nearing completion with plans to begin revenue service before the end of this calendar year, Massachusetts Department of Transportation (“MassDOT”) and Massachusetts Bay Transportation Authority (“MBTA”) must now complete the environmental review process of Phase II to determine the costs and benefits of extending the Green Line to Route 16/Mystic Valley Parkway.

As recently as the Focus40 MBTA 2040 investment plan, released on March 18, 2019, MassDOT and MBTA have committed to funding and completing environmental review of Phase II, with explicit reference to MPO funding for this project. Focus40, which is still a current and active plan, includes as one commitment under the header “Green Line 2040, We’re Doing (Commitments through 2023)”: “MassDOT/MBTA have committed to advancing [Phase II] with an updated environmental review ... MassDOT/MBTA will complete the Massachusetts Environmental Policy Act (MEPA) process that was initiated as part of the commitment of MPO funding to the Green Line Extension and, upon completion, score the project for potential inclusion in the CIP and/or the Boston Region MPO Regional Transportation Plan.”⁴ It is unclear how the MPO’s proposed removal of funding for the GLX project in Amendment Three will not further delay the completion of this review process, and how the MPO can reconcile this proposed cut with existing and already-delayed commitments to fund and complete this review by 2023.

CLF has advocated for completion of the GLX for decades, including the terminus at Route 16/Mystic Valley Parkway. This project will reduce greenhouse gas emissions, helping to meet the Commonwealth’s obligations pursuant to the Massachusetts Global Warming Solutions Act, An Act Creating a Next-Generation Roadmap for Massachusetts Climate Policy, and GreenDOT, which mandates the MPO to take GHG emissions into account for purposes of TIP planning. The Route 16 station would be sited on a local thoroughfare, and in proximity to several bicycle and pedestrian paths along Alewife Brook and Mystic River, and is thus better situated for a rail terminus. It would also provide more equitable access to transit, and thus to economic and educational opportunities, to several state-defined environmental justice populations in Medford, Somerville and Arlington currently underserved by transit.⁵

Massachusetts’ commitment to complete the GLX to Medford Hillside is a legacy commitment by multiple Governors, prior TIPs, the Big Dig MOU, the current MBTA Focus40 Plan, and the SIP. This project cannot be deemed complete without - at a minimum - a thorough environmental assessment of Phase II. Because MassDOT and MBTA require further funding to complete an environmental impact review and cost assessment of extending the Green Line to Route 16/Mystic Valley Parkway, the MPO’s current funding of the GLX for FFY 2022 is still, contrary to the MPO’s conclusion, “necessary to close out construction.” Accordingly, CLF urges the MPO not to

⁴ Focus40, Section 3, Places & Programs, Page 43;
<https://static1.squarespace.com/static/57757a3cff7c50f318d8aae0/t/5c904501f9619a6b93cd1ee0/1552958737005/05-Programs.pdf>

⁵ See <https://www.mass.gov/info-details/environmental-justice-populations-in-massachusetts>

adopt this proposed amendment to remove funding for the GLX project and to continue to fund the GLX at its current commitment for FFY 2022 to cover the cost of an environmental assessment.

Thank you for your consideration of these comments and the MPO's continued dedication to the GLX project.

Respectfully submitted,

A handwritten signature in black ink that reads "Staci K." with a horizontal line extending to the right.

Staci Rubin
Vice President, Environmental Justice
Conservation Law Foundation
62 Summer Street
Boston, MA 02110
Phone: 617-850-1781
Email: srubin@clf.org

Johannes Epke
Staff Attorney
Conservation Law Foundation
62 Summer Street
Boston, MA 02110
Phone: 617-850-1761
Email: jepke@clf.org

April 27, 2022

Mr. Genova and members of the Boston Region MPO:

GLX is not complete until ALL obligations are met. GLX Phase I provides a TEMPORARY terminus at Tufts / College Avenue in Medford, a mile short of Mystic Valley Parkway / Route 16, the PREFERRED terminus the last time a complete analysis and review was performed

Currently, completion of an EIR for the last mile, GLX Phase II, is committed for 2023 and completion of the legally-mandated full extent of GLX is “imagined” for some later time.

At some point in history, funding was earmarked for GLX Phase II. To avoid jeopardizing GLX in any form, monies were reassigned from Phase II to Phase I. The funds remaining in the Phase I account are not surplus funds until such time as Phase II is fully funded.

Thank you,

John Roland Elliott
GLX Proponent for Seventeen Years
Medford Hillside

Ken Krause
50 Mystic Street Medford, MA 02155
781-874-0920 kenneth.krause@comcast.net

April 27, 2022

Matt Genova, Manager, mgenova@ctps.org
Boston Region MPO CTPS
State Transportation Building
10 Park Plaza, Suite 2150
Boston, MA 02116

Dear Ms. Teich and Mr. Genova,

Thank you for the opportunity to comment on Amendment Three to the Boston Region MPO's Federal Fiscal Year 2022–2026 Transportation Improvement Program.

After 18 years of involvement in advocating for the Green Line Extension (GLX) project, it is very gratifying that Phase 1 of the project is nearing completion this year. I appreciate the MPO members' consistent support of this project, over the last decade in particular.

I have no objection to the proposed TIP Amendment Three actions to remove of the \$27.1 million in surplus funds from GLX Phase 1 and to allocate \$65.3 million to the bridge replacement work over Maffa Way in the Somerville Square area of Charlestown.

What I would request, however, is that the MPO's vote to approve TIP Amendment Three be contingent on MassDOT and the MBTA publicly re-committing at the April 28, 2022 MPO meeting to performing and paying for the Supplemental Environmental Impact Report (SEIR) for Phase 2 of the Green Line Extension by the end of the next fiscal year, June 30, 2023.

Back in May 2016, MassDOT committed to continuing the environmental review of GLX Phase 2, using state funds, including the completion of a Final Environmental Impact Report, as a condition of the MPO reprogramming \$158 million in federal funds that it had allocated for GLX Phase 2. Those funds were reprogrammed to close a funding gap for GLX Phase 1, which not only kept the project viable, but also included the very funds proposed to be reprogrammed through this TIP Amendment.

MassDOT began the GLX Phase 2 environmental review process in October 2017 with the filing of a Notice of Project Change with the Executive Office of Energy and Environmental Affairs. In December 2017, then EOEI Secretary Matthew Beaton determined that a Supplemental Environmental Impact Report was required for GLX Phase 2, and issued its scope.

However, some 4.5 years later, MassDOT and the MBTA remain delinquent on fulfilling this important condition of the MPO's 2016 vote — a condition MPO members insisted on and unanimously agreed be included.

It is most appropriate at this juncture for the MPO to take official action to remind MassDOT and the MBTA of the 2016 commitment it made to the body, and to the City of Medford in the form of a letter (attached here) from then-Secretary Stephanie Pollack. The credibility of both the MPO and MPO process, and MassDOT/MBTA, depend on it.

GLX Phase 2 — a .9-mile extension from the Medford/Tufts Station on the Medford Branch to a station at Mystic Valley Parkway (Route 16) on the Somerville/Medford border — was identified by MassDOT as its preferred full-build alternative for the GLX because it maximized the project's primary goals: to improve corridor mobility, boost transit ridership, improve regional air quality, ensure equitable distribution of transit services, and support opportunities for smart growth initiatives and sustainable development.

Those goals continue to align both with current state transportation planning documents, including the MBTA Capital Improvement Plan, and the MBTA's Focus 40 Plan. The latter plan, which is the road map to position the MBTA to meet the needs of the region in 2040, specifically includes GLX Phase 2 in its list of projects.

Therefore, it is appropriate that the MPO's approval of TIP Amendment Three for FFY 2022–2026 include a condition that MassDOT fulfill its 2016 commitment to the MPO to complete the environmental review process for GLX Phase 2, specifically, the Supplemental Environmental Impact Report required to EOE, by June 30, 2023.

Thank you for your consideration.

Sincerely,



Ken Krause
50 Mystic St.
Medford, MA 02155
781-874-0920



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

May 4, 2016

Mayor Stephanie Muccini Burke
Medford City Hall
85 George P. Hassett Drive, Room 202
Medford, MA 02155

Dear Mayor Burke,

This letter outlines my commitment to continue planning for the Green Line Extension (GLX) to Route 16/Mystic Valley Parkway in Medford. By the end of calendar 2016, MassDOT will initiate the Massachusetts Environmental Policy Act (MEPA) process by filing an Environmental Notification Form (ENF) for the extension of the Green Line from College Avenue to Route 16. We further commit to carry the MEPA process through to a Final Environmental Impact Report, and issuance of final certificate, so long as we continue to advance the Lechmere to College Ave portion of the GLX project.

I understand the desire by supporters of the Route 16 extension to keep the \$152.1 million currently programmed in the Boston Metropolitan Organization (Boston MPO) FFY 2016-2020 Transportation Improvement Program (TIP). Unfortunately, projected cost increases have forced the MassDOT Board and MBTA Fiscal Management and Control Board to reconsider the first phase of the GLX project, which only extends to College Avenue in Medford. I am hopeful, therefore, that the Boston MPO affirmatively moves those funds into the first phase of GLX so that more of the needed funding is available to bring the extension to College Avenue. Unless we reach College Avenue, there is no possibility of reaching Route 16.

If phase one of the GLX moves forward into federal approval, procurement, and a successful public bidding process, I commit to funding the necessary environmental and engineering analysis to understand the Route 16 extension's impacts, ridership, alignment, right-of-way needs, and cost estimate. I further commit to explore funding alternative during this process.

Before filing the ENF, I commit to meeting with you and other stakeholders to discuss the planning that has been conducted to date for the Route 16 extension, aspects of the extension that will be studied as part of the MEPA process, and a preliminary cost estimate.

Sincerely,

Stephanie Pollack

April 27, 2022

Re: Reprogramming GLX TIP funding to complete the Route 16 terminus Environmental Impact Review

Somerville residents are very pleased that the Union Square GLX branch has opened and the branch terminating at College Avenue is to open this summer. However, we are very concerned that the Environmental Impact Review for extending the line from College Avenue to Route 16 has not been done. The agreed upon terminus for the GLX is Route 16. The MPO needs to ensure that this will happen as this station will serve residents of Medford, Somerville and East Arlington. Many of the Route 16 GLX users are minority and low income neighborhood residents.

The MPO reprogrammed \$158 million of the \$162 million it allocated for GLX Phase 1 in 2016 with funds that the MPO had approved for GLX Phase 2. As a condition of reprogramming those funds, the MPO insisted that MassDOT proceed with the environmental review process of GLX Phase 2, so long as GLX Phase 1 continued to proceed.

MassDOT agreed to that condition in writing, and began the GLX Phase 2 environmental review process in 2017 by filing a Notice of Project. However, it is now 2022, and despite receiving a scope for the GLX Phase 2 Environmental Impact Study from the Executive Office of Environmental Affairs, work on the EIS has still not begun, MBTA officials reasons for not proceeding is a lack of funds.

The MPO should reallocate whatever portion of funding that is "no longer needed" and not remove it from the TIP so that the Environmental Review for the Route 16 terminus can proceed now. It should not be removed from the TIP but reprogrammed for the long overdue GLX Phase 2 Environmental Impact Study that MassDOT agreed to perform.

Ellin Reisner

Somerville Transportation Equity Partnership

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