



# *The Commonwealth of Massachusetts*

HOUSE OF REPRESENTATIVES  
STATE HOUSE, BOSTON 02133-1054

## **CARL M. SCIORTINO JR.**

### **REPRESENTATIVE**

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### **COMMITTEES:**

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Secretary Ian Bowles  
Executive Office of Energy and Environmental Affairs  
MEPA Office, Attn: Holly Johnson, MEPA Analyst  
EEA #13886  
100 Cambridge Street, Suite 900  
Boston, MA 02114

Dear Secretary Bowles:

I am writing in regards to the proposed MBTA Green Line Extension to Medford and Somerville. As you may know, much of the proposed project runs through both communities in my legislative district. As such, I have had the opportunity to attend nearly every public meeting on this project over the past five years, and appreciate the opportunity to share my comments with you on the Draft Environmental Impact Report.

It is my firm belief that the green line extension will be a major benefit for my communities, and for the environmental health of the region. There is no transportation project currently in the pipeline in the Commonwealth that comes anywhere near the environmental benefits that the green line extension will facilitate. I look forward to completion of the entire project, from Lechmere all the way to both Union Square and Route 16 by December 31, 2014, and share my comments below in light of that goal.

### DEIR Not Final

I am strongly urging you as Secretary to require the entire scope of work be completed that was outlined in your original Certificate on the EENF in December 2006. That Certificate called for a number of items to be studied that have not been adequately addressed by this DEIR. Specifically, the DEIR identified the Route 16 extension as the preferred alternative, but study of this alternative is not complete.

The EENF Certificate made it clear what would be required to allow the DEIR to be the final document: "If the DEIR provides a reasonably complete and stand-alone description and analysis of the project, project alternatives and environmental impacts, and adequately addresses mitigation, the regulations allow the DEIR to be reviewed as a FEIR." Many significant questions remain, and I do not believe the threshold for accepting the DEIR as the FEIR has been met.

I know there has been a suggestion made to complete the DEIR through College Avenue, and do a separate review for Route 16 at a later date. I disagree with this proposal, as I believe the separation into two phases will ultimately lead to the failure of the project to be completed in its entirety to Route 16, the stated preferred alternative. To not complete the analysis of the Route 16 terminus at this time would be a violation of the commitment made by this administration to our communities, and would violate the requirements laid out by your EENF Certificate.

Moving forward, I urge you to reject the current draft as final, and to require a supplement to DEIR. This supplement should address all of the elements laid out in the EENF Certificate, including a full analysis of the preferred alternative, including the Route 16 segment, as well as other issues raised below. I urge you to not allow the current DEIR to serve as the final document, to not allow the separation of the project into two phases in violation of the EENF Certificate's scope of work and project deadline, and to seek an end product that meets the legal requirements of this project.

### Route 16 Terminus

The preferred alternative, extending the green line all the way to Route 16, would result in the biggest reduction in vehicle miles traveled and the best improvement in air quality. I fully support making the extension to Route 16 a reality in the timetable required by the SIP Commitments the Commonwealth has made to Medford and Somerville.

The Dept. of Transportation has suggested that this project could be split into two phases, phase I to College Ave by Dec. 31, 2014, and Phase II to Route 16 at a later date. This is being proposed not because there is value in splitting the project, but purely for reasons of fiscal constraints. There are several problems with this approach.

First, the DEIR does not address how the College Ave station can adequately serve as a temporary terminus station for an indefinite length of time. There are additional considerations for a terminus station which have not been incorporated into the design of the College Avenue Station.

Second, the DEIR fails to acknowledge public concern, which I share, that stopping the project at College Avenue does not meet the legal requirements of this project to extend the green line to the Medford Hillside neighborhood. The revised SIP Regulations (310 CMR 7.0) call for the completion of the entire project, "opened to full public use," from Lechmere to Medford Hillside. Others are submitting further details on the subject, including detailed maps and analysis, but in short the Medford Hillside neighborhood is located beyond half a mile at a minimum from the College Avenue Station, and outside of that station's walkable encatchment area. In looking at the history of this project, the Beyond Lechmere Northwest Corridor Study showed the Winthrop Street Station encatchment area indicating the "Medford Hillside" neighborhood, with College Avenue as a separate station (see <https://www.commentmgr.com/Projects/1228/docs/MIS8-05-AppendixB.pdf>, Figures B6 and B7).

And third, splitting off the Route 16 extension to an unspecified later date disregards the reality that the Route 16 Station has the best air quality benefit, which is the primary purpose of the legal commitments. The Route 16 station has connectivity to bike and pedestrian paths along the Alewife Brook Parkway and Mystic River, and is situated in the middle of a dense neighborhood with potential for ridership numbers that I believe would be much higher than even the very promising projections in the DEIR. In the EENF

Certificate, the following was indicated regarding the terminus: "I note that the regulations do not specify the terminus of the line within Medford Hillside and final project designs will be dependent upon the attainment of specific emissions reductions." Stopping at College Ave, without inclusion of Route 16 by the Dec. 2014 deadline, does not attain the strongest reduction in emissions.

Additionally, the current station design at Route 16 is flawed. Throughout this process, we have sought to minimize land takings and impacts on abutters. Representatives from DOT have indicated the plan presented in the DEIR is a "worst case scenario" and indicated they have considered alternatives that do not have the dramatic impacts on businesses at the terminus location as is shown in the current design. The Secretary should require DOT to meet the requirements of the EENF Certificate, and produce design alternatives that minimize disruption to existing businesses, minimize land takings, and enhance economic development potential at Route 16.

#### Winthrop Street Station Omission

The Secretary's EENF Certificate called for the study of potential stations at College Avenue and Winthrop Street, in addition to Route 16, at the end of the line. As an alternative, requested by community members, the Certificate called for a study of the possibility of combining the College Ave and Winthrop Street stops into a single combined stop.

Having attended every advisory group meeting and neighborhood station meeting, as well as having reviewed all of the public comments submitted as a part of that process, I have serious concerns about the DEIR's recommendation in this area.

The combined College Ave/Winthrop St station concept, when presented at neighborhood meetings, raised many questions and concerns of abutters. It was desirable by most that spoke and commented to not move forward with the combined approach. However, rather than continuing to study the separate College Ave and Winthrop St stations as separate stations, the project team has taken the opinion that simply doing a single College Ave station was the desired option. That is not the predominant opinion that was expressed through this process. There are unique challenges in the entire corridor between College Ave and Route 16, but those appeared to be surmountable, and worthwhile.

The complete loss of an additional station without adequate or credible explanation cannot be allowed, and is not in compliance with the EENF Certificate. I believe the design and analysis of the Winthrop Street station also needs to be completed. As stated above, the current DEIR should not stand as the FEIR, and the Winthrop St. Station analysis also needs to be included in the FEIR.

#### Maintenance Facility

Unlike the Route 16 Station, which has received little attention, the planners in DOT have given a great deal of time and attention to the Maintenance Facility location and design. It is critically important to the economic development potential of Somerville, as well as the quality of life of abutters in the Brick Bottom community, to make sure this is brought to a positive resolution. Unfortunately, we are not there yet with an adequate alternative, and this further adds to why I believe the DEIR cannot serve as the FEIR.

### Lechmere Relocation

The Commonwealth has an obligation to complete the green line extension, and in order to do this, the existing Lechmere Station must be moved over McGrath O'Brien Highway. The original cost of this relocation was meant to be covered by private developers at North Point, which over the course of the environmental review has fallen apart. This leaves the Commonwealth with a financial challenge for this project, and current plans call for the cost of the Lechmere relocation to be included in the green line extension project costs.

This additional \$111 million expense is nearly the same as the projected cost in current dollars of the College Ave to Route 16 segment of the project. The Lechmere relocation is not just a benefit to enabling the green line extension, but also helps ensure the economic potential of the North Point development, and the burden of the relocation should not be bourn solely through the loss of Route 16.

It is my belief that we need to find creative solutions to paying for the Lechmere relocation, and redirect this portion of the budget to complete the Route 16 segment on time. I would urge the Secretary to continue to work with the Secretary of Housing and Economic Development and Secretary of Transportation. The North Point development, if revived at some point in the future when economic circumstances are more favorable, stands to benefit immensely from the relocated Lechmere Station. The original commitment should not be overlooked as mitigation in future developments.

### Air Quality

In determining whether this project meets the requirements of the revised SIP Regulations, we need to understand whether the air quality reduction of the green line extension, in combination with the other SIP Commitments, is adequate to meet the required 110% air quality benefit compared to the original SIP commitment package.

I will defer to others who have conducted an analysis of this question, specifically testimony being submitted by the Conservation Law Foundation, which suggests uncertainty on this point. Until we can bring resolution to this question, which is at the heart of the project's purpose, I would contend that the EENF Certificate's requirements have not been met, and further demonstrate the need to reject this DEIR as the FEIR, and move ahead with requiring supplemental analysis and submissions to complete this work.

### Conclusion

As a Representative of the project's study area, I have seen community understanding and support for this project evolve rapidly in the past two years. Many steps have been taken to reach out to stakeholder groups, neighborhoods, abutters, and community members, such that by the conclusion of this environmental review I believe there is a much fuller understanding of the project than previously existed. I applaud efforts that have occurred in the past two years to increase outreach and awareness, and to be responsive to neighborhood concerns.

With that said, I believe the scope of work required by the EENF Certificate has not yet been met. More work needs to be done to particularly around the station design of the terminus at Route 16 before many in our community can commit their support to the preferred alternative. Nonetheless, I believe the

benefits of the full extension of the green line to Route 16 are well worth the extra work required in the short term, and I urge you to work with Secretary Mullen and the Department of Transportation to expedite the work needed to satisfy the requirements for a final environmental impact report.

Sincerely,

A handwritten signature in black ink, appearing to read 'Carl Sciortino', with a long horizontal flourish extending to the right.

Carl Sciortino  
State Representative

