

Dear Secretary Bowles,

I want to acknowledge and express my appreciation for all of the work that has been done to get us to this stage of the Green Line Extension Project. The staff of the Massachusetts Department of Transportation and their consultants has put in countless hours into this project, and have made great progress in what we all acknowledge is a major undertaking. I do have several concerns and overall comments about the project and the FEIR as it is currently drafted.

Project Deadline

I want to emphasize my strong commitment to seeing this project be completed in its entirety by the legally mandated deadline of December 31, 2014. The recent announcement by MassDOT of the potential for delay by ten additional months is unfortunate and will require mitigation if true. However, I believe we should not accept this delay at face value and the community deserves additional information.

There have been comments in the press offering theories on why this delay is expected given work done on the maintenance facility, but we have an obligation to look forward and figure out how to meet the legally mandated deadline. The public has a right to examine that schedule to ensure everything possible is being done to not just mitigate a potential delay, but to avoid delay if at all possible. *I request MassDOT be required to provide an updated project timeline as detailed as is currently possible.*

Medford Hillside SIP Commitment

As I stated in my letter regarding the Draft Environmental Impact Report, the project terminus at College Avenue and Boston Avenue **does not meet the legal requirement to bring the green line to the Medford Hillside**. The FEIR attempts to explain away this shortcoming by redefining the Medford Hillside neighborhood to include an area it has never included. The report excuses this shortcoming by arguing that the air quality requirements are met even without building the project's "preferred alternative" which is the terminus at Route 16.

In addition to the thorough analysis that has been done by the Conservation Law Foundation and Medford resident John Elliott, I also want to re-state the project's history that further supports our conclusion that the SIP requirement has not been fulfilled. When the Beyond Lechmere study was completed and included West Medford Square, many in the West Medford community and local officials expressed concerns about crossing the river and grade crossings that would be required in West Medford. Many in the community argued the project should be stopped shy of Route 16 to avoid those challenges. That was the case made by many project supporters and opponents alike.

The Secretary's EENF acknowledged that community reaction, as did the revised

SIP regulations, and required the project be studied “to Medford Hillside.” I believe that everyone involved in the community, local and state elected officials, and MassDOT itself all understood what the Medford Hillside neighborhood encompassed. In fact, as has been well documented, MassDOT's own maps and descriptions distinguished between the College Ave / Tufts University station and the Winthrop Street / Medford Hillside Station. MassDOT has failed to give adequate explanation as to why the Winthrop Street / Medford Hillside Station is not feasible. Nonetheless, it is a falsehood to pretend that stopping short of that station by terminating at College Ave actually meets the SIP requirement to go to the Medford Hillside Neighborhood.

In short, all evidence supports the conclusion that the current project terminus at College Avenue is a violation of the state's legal commitment to reach the Medford Hillside neighborhood. This makes the Commonwealth vulnerable to lawsuits for violations of the Clean Air Act and underlying regulations, and MassDOT must be required to fulfill its obligation. The preferred project with a terminus at Route 16 would fulfill that legal obligation. If there are financial or logistic reasons this cannot be achieved by December 31, 2014, the state has an obligation to provide mitigation to the community.

Appropriate Mitigation

Given both the potential of a delay beyond 2014, as well as the failure to reach Medford Hillside by terminating at College Ave, air quality mitigation will be required. It is my understanding in speaking with MassDOT that we do not know how to achieve the level of air quality benefits that would otherwise be achieved by the green line extension itself, but that work is ongoing.

I would suggest that MassDOT be required to provide specific benchmarks for the entire project all the way to Route 16, not just to College Avenue. In addition, rather than trying to provide mitigation within the existing SIP requirements, an alternative would be to move towards project substitution whereby the regulations clearly identify the Route 16 station as the terminus.

Where the Medford Hillside station was identified as being at Winthrop Street, extending the green line to Route 16 not only goes to the Hillside but also serves a larger encachment area encompassing additional environmental justice neighborhoods in West Somerville, Arlington, and West Medford. **A project substitution to clearly identify Route 16 as the terminus, with an updated project timeline, could serve to both address the legal non-compliance of College Avenue as well as address the overall project delay.**

Community Path

I applaud MassDOT for its commitment to fully designing the Community Path, but would request that the full build-out of the path be included as an integral part of the Green Line Extension Project. Federal guidelines around the New Starts program made the case that pedestrian and bicycle access would enhance

the evaluation of transit projects such as this one. The path would ensure greater ridership and usability of the proposed stations, and further the project's goals of improving air quality by encouraging the highest level of non-automobile access.

As stated above, I believe a project substitution that specifically includes Route 16 might be an appropriate mechanism for mitigating existing shortcomings of the project. The inclusion of the building of the Community Path in such a substitution would add to the project's quality, its competitiveness with New Starts funding, and would add to the mitigation needed for delays. **The path should be viewed not as an add-on bonus to be completed in some unknown timetable with undetermined funding but as an integral part of the green line and included in timetables and funding applications.**

Community Participation

I have been proud to see so many of my constituents in Medford and Somerville get actively engaged in the planning and design of this project. Through the advisory group process, station-specific meetings, and full project public hearings and meetings, one thing has been clear: our local residents not only have a lot of interest in participating fully, but have a lot of expertise to bring to the table.

I appreciate the steps MassDOT has already taken to improve neighborhood communications. This has included newsletters, regular email updates, a website with timely updates and relevant documents, and the mailing of materials and meeting notices to abutters and those that request notification. We have come a long way in the past few years in improving awareness and involvement in both Somerville and Medford, and I applaud MassDOT and the residents for their efforts and patience.

Moving forward, I would hope that interested parties would have the ability not only to shape planning of public meetings and assisting with outreach. Many of our residents have expertise in engineering, transportation planning, land use, and other useful skills. I would encourage MassDOT to have a meaningful and proactive role for such skills to be put to use in the design of this project beyond what has been laid out thus far in the FEIR.

Conclusion

I wish I could assert that the FEIR and current project status meets my expectations. In many ways MassDOT has done a stellar job under the Patrick administration in getting this project to a much better stage than it had been in prior years. Nonetheless, there are issues yet to be resolved.

This project is a rare opportunity for a significant investment of public dollars in a major infrastructure enhancement with transit, environmental, and public health benefits. It would be irresponsible for us to shortchange that opportunity

by stopping the project short of its potential, by accepting delay, or by not including the best non-vehicle access possible.

I urge you to require additional work in the above mentioned areas to ensure the Commonwealth meet its legal commitments and to ensure the Patrick administration fulfills its promises to the Medford and Somerville neighborhoods that have been waiting for too long.

Sincerely,

Carl Sciortino