

Date: July 22, 2010

To: Secretary Ian Bowles  
Executive Office of Energy and Environmental Affairs, MEPA Office  
Attn: Holly Johnson, MEPA Analyst,  
100 Cambridge Street, Suite 900, Boston, MA 02114  
c/o [Holly.S.Johnson@state.ma.us](mailto:Holly.S.Johnson@state.ma.us)

Re: EEA #13886, Urging Community Path as integral part of GLX

Secretary Ian Bowles:

We are writing on behalf of the Friends of the Community Path, a group of citizens whose mission is to extend the Path from Somerville to Boston. We believe that the Community Path is a necessary adjunct to the Green Line Extension (GLX). The Path will help to further your office's mission of promoting clean energy, curbing greenhouse gas emissions, and cutting energy costs.

Additionally, the Path will confer convenient Green Line station access and encourage ridership at a low per rider cost, meet Green DOT and LaHood objectives, help with ADA compliance and accessibility, boost area business and tourist economies, and provide desirable path access in Somerville Environmental Justice neighborhoods.

We hope that Community Path construction will be the first legacy of the MassDOT's GreenDOT initiative. As you can see, our "Got Path?" buttons and T-shirts give a nod to the GreenDOT initiative.

We are writing to urge you to add a notification of change to MassDOT's Final Environmental Impact Statement (FEIR) for the GLX, to state that the Path extension infrastructure will be included as part of the GLX project design, construction, and funding all the way to Lechmere, even while full funding from other sources is still being identified.

With this FEIR notice of change in mind, we urge you to require that MassDOT:

1. Design the Path to reach all the way to Lechmere/North Point – through the Somerville Environmental Justice neighborhoods of Winter Hill and East Somerville – and not just to Inner Belt (as stated in the FEIR).
2. Make the commitment that the Community Path extension is part of the Green Line project even while full funding is still being identified.

3. Include the costs for the construction of the Community Path extension infrastructure components in the planned Design/Build Contract and in the funding applications for the Green Line Extension to Lechmere, such as FTA's New Starts.
4. Co-sponsor or at least support the Tiger II grant application with the City of Somerville to fund the remaining Community Path elements of the GLX and help fund the 20% match. (Final application is due August 23)
5. Continue to work with Somerville to apply for other funds for Community Path construction such as the proposed Active Community Transportation Act of 2010, House Bill 4722.

With this letter, we are submitting supporting maps, information, and a list of relevant research studies.

Thank you for your endorsement in the DEIR Certificate of extending the popular Community Path in conjunction with the Green Line Extension (GLX). Your support builds on the vision of the Southwest Corridor Park, fully meets MassDOT's GreenDOT sustainable and active transportation goals and will increase Green Line ridership at a low per rider cost. This has been demonstrated by the success of the existing Path in Cambridge and Somerville that brings thousands of residents to the Davis Square Red Line Station where boardings are almost double what were projected.

We are pleased that MassDOT has recently given approval and support for the City of Somerville's TIGER II grant application to help fund the Community Path components. However, we still need your leadership and personal intervention to ensure that this vital and regionally supported active transportation and recreation corridor is actually constructed with direct state support.

We appreciate that MassDOT is considering including partial Path infrastructure as part of the GLX project – a very significant move – though we await an official commitment.

As you may know, the main section of the Community Path extension from Lowell St. to Washington St/Brickbottom/Inner Belt must be designed and built with the Green Line Extension (GLX) because the Path has much shared infrastructure and corridor with the GLX. To date, MassDOT has committed to design the Path along the GLX to Inner Belt but not to include funding for the Path as part of the GLX Federal New Starts application or to apply for other federal funding that would require a State match (even if the match is 80% federal and 20% state).

The Friends of the Community Path, STEP and other advocates for active transportation in the region believe strongly that this approach is "penny-wise and pound-foolish" considering that the additional infrastructure needed for the Path represents only about 2% of the GLX cost – a figure well within the uncertainty of the costs. These 2.5-miles of proposed path will bring pedestrians, cyclists, wheelchairs, scooters, etc., to 4 of the 7 Green Line extension stations, and goes beyond just a wise investment for the Commonwealth.

The Path will provide the most environmentally sound and cost-effective way to increase Green Line ridership.

It will also be a critical zero-emissions-transportation link that will offer great environmental, health, safety, noise-reduction, and community benefits to Somerville -- and, moreover, to the region.

This key multi-modal Path is a (now missing) link that will connect some ~40 regional miles of path, finally linking the Minuteman trail with the Charles River Paths, and all of their offshoots. These paths reach through Bedford, Lexington, Arlington, Cambridge, Somerville, Boston, and Medford to the Red and Green Lines (in Cambridge and Somerville) and to Boston, Waltham, and Watertown, and the Charles River paths.

This will dramatically increase opportunities for bicycle tourism through all of these cities and towns. The Path will also be the eastern end of the 104-mile cross-state Mass Central Rail Trail to Northampton.

As a whole, the City of Somerville has the second greatest exposure to pollution and the least open space in Massachusetts. The Community Path will help promote zero-emissions transportation and curb greenhouse gases by encouraging non-motorized transportation through Somerville and throughout the region.

In addition to providing green transportation options, the multi-use Path extension will also provide desperately-needed urban recreation space to Somerville.

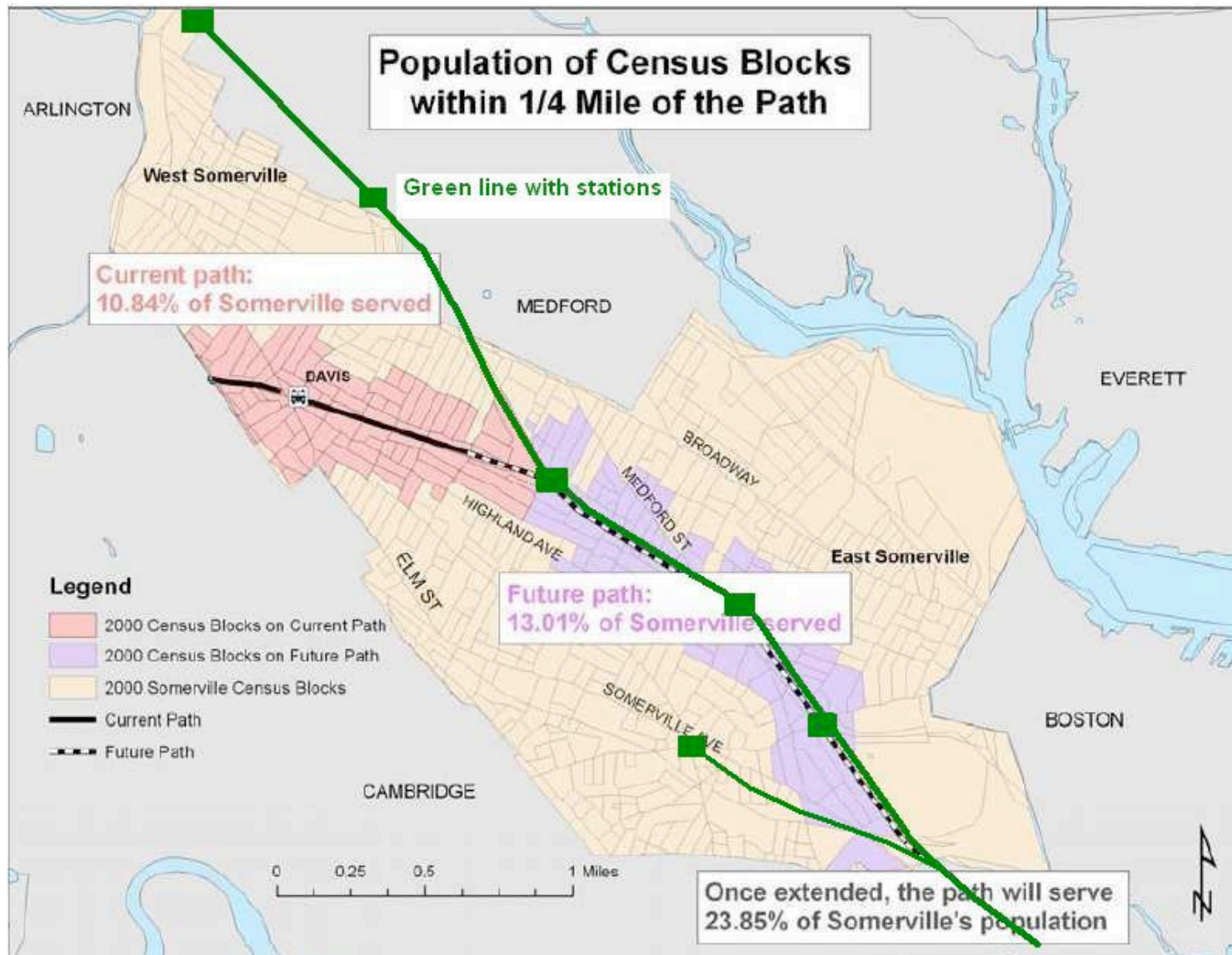
Notably, about half of the proposed Path is in the Somerville Environmental Justice neighborhoods of Winter Hill and East Somerville. These neighborhoods have no direct Path access now, as compared to the other more affluent communities listed above. The Path will help curb greenhouse gas emissions, increase job and educational opportunities via pedestrian and bicycle transportation access, re-vitalize business economies, introduce tourism opportunities, and add much-needed green space in these Environmental Justice neighborhoods.

In summary, I urge you add a notification of change to the FEIR, to state that the Path extension infrastructure be included as part of the GLX project all the way to Lechmere, in terms of design, construction, funding, and relevant funding applications. We are committed to working with MassDOT and other government agencies on this critical active transportation, transit, and recreation corridor project

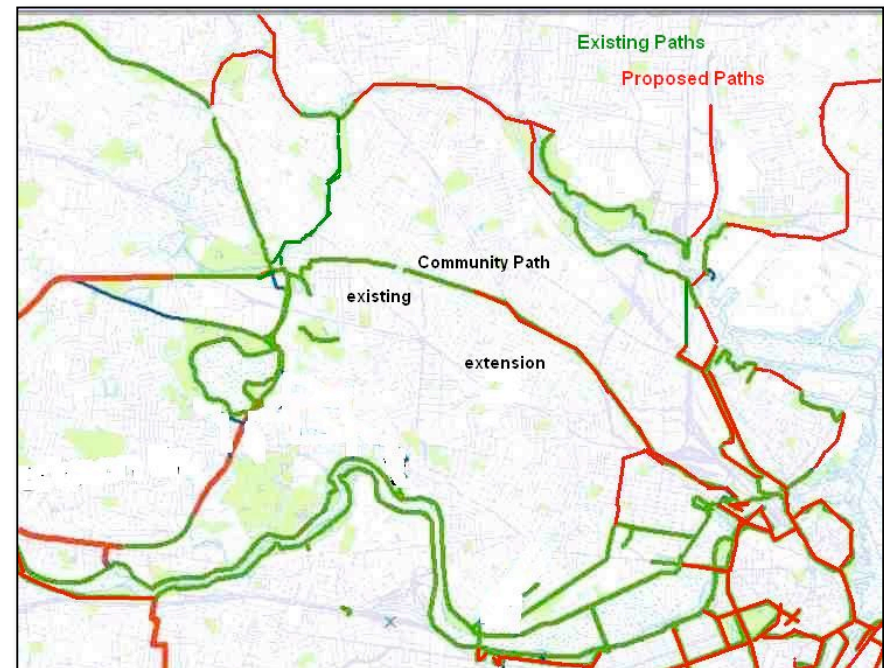
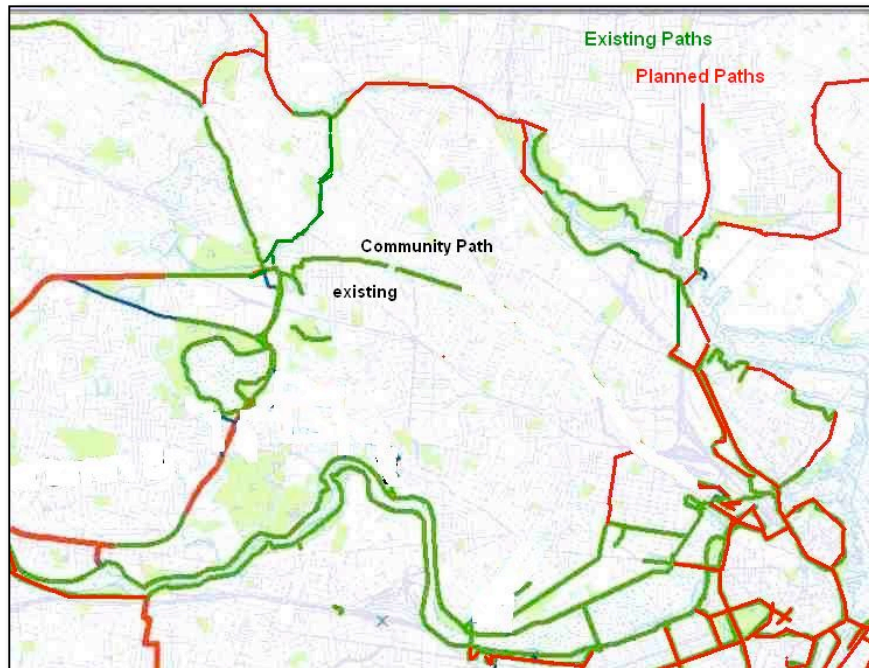
Thank you very much for your consideration of this public comment.  
Sincerely,

Alan Moore and Lynn Weissman  
Friends of the Community Path

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## Future Greenway/Path system without and with the Community Path:





## Supporting Information for Building the Community Path with the Green Line Extension

- The Path extension is only 2.5 miles, covering 4 of the 7 GLX stations, but has a vast return on investment. The additional infrastructure needed for the Path represents only about 2% of the GLX cost – a figure well within the uncertainty of the GLX costs: The 2.5-miles of proposed path will run along 4 of the 7 Green Line extension stations. The Path will bring T-riders to the new Green Line stations in a **cost-effective, quiet, safe, quiet, pleasant, healthy, and environmentally sustainable** manner.
- The Community Path extension will provide convenient Green Line access, low cost ridership, meet MassDOT's **Green DOT sustainable and active transportation goals**, and meet **LaHood objectives**.
- The Commonwealth's **Healthy Transportation Compact** directs MassDOT and other agencies to "Develop policies to create a transportation system that increases opportunities for physical activity — particularly safe bicycle and pedestrian travel along and across roadways in urban and suburban areas". The Path is a perfect example of a Green Transportation Corridor that meets all these goals.
- MassDOT's "**GreenDOT**" campaign aims at reducing greenhouse gas emissions, promoting healthy transportation alternatives and supporting smart growth development by incorporating sustainability into all of its activities, from strategic planning to project design and construction. The Community Path will be the first legacy of this campaign.
- There is significant **regional support** for completing the Community Path because it will **connect dozens of miles of regional greenways** and paths in the region (such as the 13-mile Minuteman Bikeway from Bedford, Lexington, Arlington, and Cambridge; the Watertown branch trail; the Alewife Brook Paths; and Mystic River trails from Medford) to downtown Boston and the Charles River paths. The Path will also be the eastern end of the 104-mile cross-state Mass Central Rail Trail to Northampton.
- This will dramatically increase opportunities for bicycle tourism and related businesses through all of these cities and towns.
- About half of the proposed Path is in the **Somerville Environmental Justice neighborhoods** of Winter Hill and East Somerville. These neighborhoods have no direct Path access now, as compared to the other more affluent communities listed above. The Path will help curb greenhouse gas emissions, increase job and educational opportunities via pedestrian and bicycle transportation access, re-vitalize business economies, introduce tourism opportunities, and add much-needed green space in these Environmental Justice neighborhoods.
- As a whole, the City of Somerville has the second greatest exposure to pollution in Massachusetts. This city has more miles of roads per land area than any other surrounding community—approximately 25 miles of road per square mile of land.

Somerville has some of the highest rates of lung cancer and heart attack deaths in the state; some researchers think that's partly due to poor air quality caused by highways. The **Path** is a critical transportation link that will help promote **zero-emissions transportation and will curb greenhouse gases** by encouraging non-motorized transportation throughout the region.

- As a whole, the City of **Somerville has the least open space in Massachusetts**. In addition to providing green transportation options, the **Path extension will also provide desperately-needed urban recreation space** to Somerville.
- Local precedence for **active transportation paths** being funded with federal and state transit money includes the Linear Path/Community Path over the Red Line to Alewife and the Southwest Corridor path along the Orange Line as Secretary Jedd Mullan recently proudly pointed out at its 20th anniversary.
- The Green Line extension does not include parking structures. The Path will enhance T-ridership on the Green Line in a **cost-effective and environmentally sustainable** way, as it provides access to the new stations from the neighborhoods and is therefore integral to the stations. Between stations, the parallel Path will allow a larger catchment area because of the more pleasant and direct route it will provide.
- As in Davis Square, where **> 60% of the residents use public transportation** and thousands walk and bike to the station each day along the Community Path, the extension will provide the same off-street and pleasant pedestrian/bike access to four of the new Green Line stations, increasing ridership.
- The Community Path will help with **ADA compliance and accessibility** to T-stations.
- The Path and Green Line extensions will run near 6 Somerville public schools (Brown, Winter Hill, Somerville HS, Capuano School, East Somerville School, Edgerly School) and 2 Somerville public libraries. The Path will **create safe, active routes to schools with good air quality, helping to fight the epidemics of childhood obesity and asthma**. After dropping their children off at school, many **parents can hop on the Green line to get to work**. Older students can commute to **jobs** and after-school activities via the Path and Green Line.
- The federal Department of Transportation's interagency **Partnership for Sustainable Communities** policy is to "develop safe, reliable and economical transportation choices to decrease household transportation costs, reduce our nation's dependence on foreign oil, improve air quality, reduce greenhouse gas emissions and promote public health."
- Regarding **FTA New Starts funding**, the Federal Register (58680) already says: "FTA grantees may use any of the following programs to fund capital projects for pedestrian and bicycle access to a public transportation facility: Section 5307 Urbanized Area Formula Program Section 5309 New Starts and Small Starts Major Capital Investment Programs".

- The New England office of the Federal Transit Authority has indicated that including the Community Path in the Green Line Extension application for **New Starts** funding would help our **competitiveness**.
- The **cost** for the "additional" Community Path elements has been estimated by assDOT's consultants at \$16 million, not including land acquisition, environmental or bridge costs to cross the Fitchburg line. Assuming these additional costs will bring the total costs over \$20 million, this is about 1.5% -2 % of overall GLX project costs. At present there is \$3.5 million in CMAQ funding and \$1 million in SAFETEA-LU funds reserved in the 2010 – 2013 TIP for the Path. It will cost much more (if even possible) to construct the Path extension as a separate project, yielding the grim possibility that the Community Path extension may never get built.
- **TIGER II funding** will require a lower State match (20% vs. 50%) for the Community Path than the New Starts funding source. MassDOT is committed to completing the Green Line by the end of 2014 and is beginning the engineering design soon. The March 22, 2010 schedule prepared by VHB shows that the Final Design will be 50% complete by the September 2012 deadline to obligate the a TIGER II grant award.
- In a similar project, the proposed light-rail **Purple Line and Capital Crescent trail** in Maryland, their final environmental impact statement stated *"The construction of the Capital Crescent Trail between Bethesda and Silver Spring is part of the Purple Line."* [http://purplelinemd.com/images/stories/purpleline\\_documents/deis/deis/10\\_chapter5.pdf](http://purplelinemd.com/images/stories/purpleline_documents/deis/deis/10_chapter5.pdf)
- The **Active Community Transportation Act of 2010** <http://tinyurl.com/yj72ghv> will make more funds available for the Community Path and connecting trails and greenways.
- The Federal DOT's new **Policy Statement on Bicycle and Pedestrian Accommodation** Regulations and Recommendations emphasizes multi-modal transportation systems and Secretary of Transportation Ray LaHood has stated that: *This is the end of favoring motorized transportation at the expense of non-motorized.*
- On January 15, 2010, Ian Bowles, Massachusetts Secretary of Energy and Environmental Affairs accepted MassDOT's DEIR for the Green Line Extension Project with this comment: *Lastly, I strongly encourage MassDOT and the City of Somerville to work together to seek State and federal funding opportunities to facilitate construction of the Community Path concurrently with the project.*



## **Research Studies Supporting the Extension of the Community Path, an Off-Road Multi-Use Transportation Corridor, with the Green Line Extension**

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Gotschi, Thomas and Kevin Mills. Active Transportation for America: The Case for Increased Federal Investment in Bicycling and Walking. Rails to Trails Conservancy. Washington, DC, 2008.

Key Words: Obesity; Physical Activity; Costs and Benefits.

This report gives quantitative data on the **benefits communities can experience from prioritizing walking and cycling, including cost of transportation, oil dependence, climate change and public health**. Further states that communities conducive to bicycling promote a richer and denser mix of residences and businesses, leading to shorter trip distances. Shorter trip distances increase the likelihood of public transportation use. Cycling and walking can also improve public transportation use by providing better access to it.

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Steps towards a Walkable City: Proposed Framework for a Toronto Walking Strategy. City of Toronto, 2007.

[http://www.toronto.ca/transportation/pedestrian/walking\\_strategy/pdf/walkable\\_city.pdf](http://www.toronto.ca/transportation/pedestrian/walking_strategy/pdf/walkable_city.pdf)

Key Words: Walking; public transportation networks; community development.

**Walking and cycling paths contribute to a wider network of transportation, the expansion of which has clear and defined benefits for a community.** Paths can decrease the need for parking, especially around public transportation sites. Vibrant and active paths will increase the safety of an area.

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Tilahun, NY, et al. Trails, lanes or traffic: Valuing bicycle facilities with an adaptive stated preference survey. *Transportation Research Part A – Policy and Practice*. 2007: 41(4); 287-301.

Key Words: Bicycling; Stated preference; Trails.

The study examined facility preference of five different cycling environments. Findings suggest that **people are willing to travel up to 20 minutes more to switch from an unmarked, on-road bicycle facility to an off-road bicycle trail**.

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Burke, NM, et al. The Path to Active Living: Physical Activity through Community Design in Somerville, MA. *Am J Prev Med.* 2009; 37 (6S2).

Key Words: Health; Obesity; Community Intervention.

Features detailed demographic overview of Somerville. Focus is on **obesity and healthy living through community interventions**, especially as it affects **the less affluent population of East Somerville**. States that **bike path expansion is supported by City of Somerville Office of Strategic Planning and Community Development and several mayoral administrations, but because of lack of funds, this will have to be done through advocating for federal transportation dollars**.

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Int Panis, Luc, et al. Exposure to particulate matter in traffic: A comparison of cyclists and car passengers. *Atmospheric Environment.* 2010; 44: 2263-2270.

Key Words: Traffic Emission; Air Pollution Inhalation; Cycling; Physical Activity.

Both **car passengers and cyclists in traffic are exposed to similar levels of air particulates; cyclists, however**, have a higher breathing frequency (app. 4.3 times higher), and **therefore have greater lung deposition of PNC and PM mass**. Concentrations are therefore unreliable in predicting health risks, and exposure estimates should be used instead.

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US Department of Transportation. Case Study No. 9: Linking Bicycle/Pedestrian Facilities with Transit. Washington, DC, 1992

Key Words: Linking Transportation; Bicycle and Pedestrian Access; History of Public Transport

An extensive report featuring detailed summaries of the following: Historical context of public transportation in Europe and the United States, marketing ideas to improve pedestrian and bicycle use, ideas for necessary facilities and cost benefit analysis. States that **besides increasing the use of public transportation, bike paths will also reduce the number of bicycle related accidents on the road** (p136). Cites examples from the Netherlands and Australia.

**Quote: “Without good pedestrian and bicycle access to transit, the only way passengers can be attracted out of their cars is to provide extensive and expensive parking at transit stations and stops. Indeed, this is the direction that many US transit agencies have taken, encouraged by Government funding programs which for decades have favored park-and-ride lot construction over the provision of pedestrian and bicycle facilities.”**

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Southworth, Michael. Designing the Walkable City. *J Urban Plng and Devel.* 2005, 131(4); 246-257.

Key Words: Theory and method of planning; Health benefits.

**Theoretical article stressing that the quality of pedestrian or bike routes is key in encouraging people to walk instead of drive, which leads to an increase in the use of public transportation.** Provisions for pedestrian and bicycle access is now mandated in federally supported projects.

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Vanderbilt, Tom. What would get Americans Biking to Work? *Slate Magazine*, 2009.

Key Words: Transportation; Parking.

Discusses **secure parking for bicycles as a motivator for bike use over car use.** Includes a review of new policies requiring adequate and safe parking for bicycles and their effect on transportation.

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