



CITY OF SOMERVILLE, MASSACHUSETTS
JOSEPH A. CURTATONE
MAYOR

October 21, 2004

Ms. Christine Kirby, Chief
Transportation Management Programs
Department of Environmental Protection
One Winter Street
Boston, MA 02108

RE: *Transit Commitments Administrative Consent Order*
2004 Project Update and Project Schedule

Dear Ms. Kirby,

Thank you for the opportunity to comment on the *Transit Commitments Administrative Consent Order - 2004 Project Update and Project Schedule* submitted to the Department of Environmental Protection (DEP) by the Executive Office of Transportation (EOT).

The City of Somerville strongly opposes any attempt at this time to revise the Administrative Consent Order (ACO) transit commitments. These commitments include a project of great importance to Somerville: namely, the Green Line Extension to Ball Square/Tufts University. The MBTA recently initiated a Major Investment Study (MIS) and established an Advisory Board of representatives from Cambridge, Somerville and Medford to begin the necessary planning work for this project. The City is very concerned that EOT is proposing to revisit the project as an ACO commitment when a study of alternatives has only just gotten underway. The City requests that EOT and DEP delay any change to the process applicable to the Green Line Extension Project until such time as the MIS is completed, a local preferred alternative is defined, and additional analysis is undertaken concerning the costs and benefits of the project.

In addition to believing that a substitution process would be premature in light of the current MIS, the City also objects to changing the process on other grounds. EOT has not demonstrated that the project is "infeasible due to associated adverse engineering, environmental or economic impacts" as required by 310 CMR 7.36(4)(a). There were and still are numerous sound reasons for including the Green Line Extension project as one of the transit commitments. To name a few: (1) Somerville is very underserved by public transit in general; (2) the Central Artery project has generated specific adverse traffic impacts in Somerville through the elimination of the off-ramp at Charlestown and

the construction of a new off-ramp at Washington Street; and (3) vehicles have to backtrack through Somerville to Medford in order to access the I-93 South HOV lane, which is closed to vehicles by the time it reaches Somerville.

Secretary Grabauskas states in his letter that "EOT clearly recognizes the air quality benefits of the transit/SIP commitments and is dedicated to providing equal or greater air quality benefits if, in fact, any changes to the existing list of outstanding projects are proposed." EOT is required under the regulations to demonstrate that "the alternative project achieves equal or greater emission reductions of nonmethane hydrocarbons (NMHC), carbon monoxide (CO) and nitrogen oxides (Nox) and provide a greater improvement in air quality for CO and NOx in the area where the required project was to have been implemented in both the short and long term" [310 CMR 7.36 (4)(a)(1), emphasis added]. This means that any proposed substitute project must provide equal or greater air quality benefits for the Somerville community, not just the region as a whole. The Secretary's letter includes a table that appears to be important and provides some numbers for the Green Line Extension, but this table is by no means self-explanatory, and the City needs additional information to be able to address it.

When the Major Investment Study is completed in early 2005, the MBTA will have defined a local preferred alternative for the project, which may or may not differ from the alignment described in the MBTA May 2003 *Program for Mass Transportation (PMT)*. At that time, the City will take an informed position as to whether it supports the preferred alternative or some modified version of it. In the meantime, the City will continue to work with the MBTA and the community to ensure that transit needs are met and that this essential planning process continues in a productive way.

Once again, we thank you for the opportunity to comment. If you have any questions or comments, please contact my office at (617) 625-6600 x2100.

Sincerely,



Joseph A. Curtatone
Mayor

ccs: State Senator Jarrett Barrios
State Senator Charles Shannon
State Representative Vincent Ciampa
State Representative Timothy Toomey
State Representative Patricia Jehlen
Conservation Law Foundation (CLF)
The Honorable Board of Aldermen, City of Somerville
Somerville Transportation Cabinet
Somerville Transportation Equity Partnership (STEP)