



# 495/METROWEST PARTNERSHIP

*Leaders for Regional Prosperity*

September 12, 2011

Mr. David J. Mohler  
Chair, Transportation Planning and Programming Committee  
Boston Region Metropolitan Planning Organization  
10 Park Plaza, Suite 2150  
Boston, MA 02116

RE: *Paths to a Sustainable Region*, the Boston Metropolitan Planning Organization's draft Long-Range Transportation Plan

Dear Mr. Mohler:

On behalf of the 495/MetroWest Partnership, please accept the following as our official comments regarding the Boston Region MPO's draft Long-Range Transportation Plan, *Paths to a Sustainable Region*.

The 495/MetroWest Partnership is a non-profit advocacy organization serving thirty-two communities, over half a million residents, and an employment base of approximately \$17 billion, by addressing regional needs through public/private collaboration, and by enhancing economic vitality and quality of life while sustaining natural resources. The Partnership is concerned about regional constraints and limitations, and conducts numerous initiatives on transportation, workforce housing, and water resources.

The 495/MetroWest region has experienced significant growth over recent years which has resulted in opportunities and benefits, as well as presented a series of complex and conflicting transportation challenges. If ignored, these challenges threaten the quality of life and economic wellbeing of a region that has become an economic engine for the Commonwealth. Our regional transportation challenges affect the state's ability to remain economically competitive. These challenges include: increasing traffic congestion, an increase in vehicle miles traveled, highway capacity issues, gaps in public transit, and aging transportation infrastructure.

The following statement from the Recommended Plan serves as a guide for the Partnership's commentary, "Given the funding constraints, maintenance challenges, and capacity issues, there was consensus that no additional regionally significant projects should be selected in the new LRTP and that the LRTP should honor its previous project commitments." One of the previous project commitments in the *Journey to 2030* LRTP, was the I-495/I-290/Rte. 85 Interchange in Hudson and Marlborough. The project was subsequently removed from the Plan as part of a 2009 Amendment and moved to the Universe of Projects and Illustrative lists. While we understood the financial constraint which necessitated the Amendment, we are greatly disappointed by the inability to fund or even plan to fund this critical project during the next 23 years. The project has completed the ENF process and the Interchange Modification Report is underway. This project is a priority for the MassDOT Highway District 3 office in addition to being a long-standing priority of the Partnership and the 495/MetroWest region. Moreover, as we understand it, Federal Highway will not consider the project until it is on the Plan.

We appreciate that the I-495/I-290/Rte 85 Interchange is included on both the Universe of Projects list as well as on the Needs Evaluation for the West Corridor. However, we noted that under the Needs Evaluation, the Project is not considered as meeting the MPO policies on Livability and Economic Benefit, nor Environment and Climate Change. The Partnership urges the Boston MPO to re-evaluate the potential benefits of the project. Furthermore, it is perplexing that in the Regionwide Needs Assessment, Chapter 10 of Volume 2 of the *Paths to a Sustainable Region*, this Interchange is not included in Table 10-1 as a Corridor Bottleneck; it is only noted as a Freight Bottleneck Location. As a reminder of the importance of this project to the 495/MetroWest Region, below please find an overview of the history and highlights of this project.

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Additionally, we would note the prudence of leveraging the investment in the Route 85 project in Hudson, currently scheduled for FFY 2011 in the TIP, by addressing the congestion and safety issues at the interchange with I-495 and I-290.

#### I-495 /I-290/Rte 85 Interchange in Hudson and Marlborough

To prioritize the region's transportation needs, in 2004 the Partnership collaborated with the *MetroWest Daily News* and Community Newspapers Company to solicit nominations of regional 'transportation nightmares' from commuters, residents, and employers. The committee members - municipal officials, transportation professionals, and employers - then conducted an analysis of the nominations to determine regional priorities for transportation planning and infrastructure funding. In this process, the I-495/I-290 Interchange received the most public nominations, and the committee made the determination that it was the 495/MetroWest region's #2 Transportation Nightmare and the top interchange project requiring attention. The Partnership's high ranking for this interchange is due to the strong justification for infrastructure improvements addressing outstanding safety, economic impact, and congestion needs.

**CONGESTION:** The I-495/I-290 interchange is a critical hub of the state's transportation network, linking Central Massachusetts and the 495/MetroWest region, as well as allowing travel north to Merrimack Valley, New Hampshire, and Maine, and south to Rhode Island and Connecticut for commuters, leisure travel, and freight.

- The interchange accommodates 168,000 vehicles per day, including 95,000 on I-495 and 73,000 on I-290.<sup>1</sup>
- During evening peak hours, the interchange experiences Level of Service (LOS) F conditions at two exit ramps and two entrance ramps.<sup>2</sup>
- During the morning peak hours, the interchange experiences LOS F conditions at one exit ramp and one entrance ramp.<sup>3</sup>
- The intersection of these major corridors is a significant congestion choke point and leads to further congestion of nearby interchanges and secondary routes along local roads.
- Since projections indicate that over the next twenty-five years, the highest growth in Eastern Massachusetts is expected along I-495, the current congestion will continue to significantly worsen:
  - By 2020, five ramps will experience LOS F conditions.<sup>4</sup>
  - By 2030, there will be a 26.9% increase in traffic utilizing the interchange.<sup>5</sup>

Given the resulting relief to current and predicted congestion, it would seem appropriate to reconsider the application of this project to the Needs Evaluation criteria for Environment and Climate Change.

**SAFETY:** This interchange has become notorious among commuters, residents, truckers, municipal officials, and law enforcement for suffering from a high accident rate, primarily due to the tight turning radii on the current ramps, especially from I-290 to I-495 north despite the posted speed limit of 20 mph. The resulting turnovers can completely block access, particularly with freight trucks, and require specialized equipment to clear.

**ECONOMIC IMPACT:** The economic benefits from this project are profound given that the 495/MetroWest region is responsible for approximately \$17 billion in annual payroll, and one out of every eleven jobs in the Commonwealth. As a result of our employment growth, the region has become a net importer of labor, and thus the I-495/I-290 Interchange, as a major access point for commuters from Central Massachusetts, is even more important to the economy.

- The interchange particularly serves the communities of Marlborough, Northborough, Hudson, Westborough, Southborough, and Framingham, which collectively have approximately 53,871,000

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<sup>1</sup> MA Highway Department's MEPA Filing, 2008.

<sup>2</sup> Ibid.

<sup>3</sup> Ibid.

<sup>4</sup> Ibid.

<sup>5</sup> Central MA Regional Planning Commission and Metropolitan Area Planning Council, *495 Interchange Study*, July 2008.

square feet of leaseable commercial and industrial space and over 100,000 jobs, as well as projections of an additional 14,436 jobs by 2030.

- The interchange directly serves some of the Commonwealth's top development parcels, including...
  - Seven sites selected for the state's 43D program for expedited permitting - four in Marlborough and three in Hudson.
  - Four sites selected for the *ReadyMass* initiative to identify the state's top development locations - three in Marlborough and one in Northborough.
  - The Route 85 corridor, which is an ongoing economic development priority for Hudson and Marlborough.

Given the above information, it would seem appropriate to reconsider the application of this project to the Needs Evaluation criteria for Livability and Economic Benefit.

**PROGRESS:** Beyond the Partnership's identification of this interchange as a major regional priority, it has been recognized as a need by a wide range of other organizations, agencies, and initiatives, including:

- Being included in the 2010 Build Out Scenario;
- the MAPC MAGIC sub-region as a high priority;
- Longtime attention and work from the MassDOT Highway Division and their District 3 office;
- MEPA granting an Environmental Notification Form for the project; and
- MassDOT work on the Interchange Modification Report.

We urge the Boston MPO to consider the ongoing work on this interchange, re-evaluate the beneficial impacts to the economy and to air quality, and schedule funding as soon as possible to address the continually growing safety and congestion concerns.

Given the very limited funding available to the Boston MPO when planning the Draft LRTP, the Partnership appreciates the projects included in our region, namely, the Assabet River Rail Trail from Hudson to Acton, the Bruce Freeman Rail Trail in Acton and Concord, and the Route 126/135 Grade Separation. Additionally, we would like to thank the Boston MPO for the projects that have moved in a timely manner from the *Journey to 2030* Plan to the TIP such as the Route 85 project in Hudson.

To reiterate our support for and the importance of the Route 126/135 Grade Separation, included below is an overview of the history and highlights of the project.

#### **Rte. 135 / Rte. 126 Grade Separation**

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This interchange was ranked fourth in the Partnership's "Top Ten Transportation Nightmares" and has been recognized as a major traffic bottleneck, because it incorporates two rotaries, three traffic signals, and two railroad tracks in active use by commuter and freight trains, which are about to become even more active with the CSX deal on the Worcester/Framingham Commuter Line.

Despite this interchange's complicated and complex interaction of traffic, it is highly utilized. In both morning and evening peak periods, the interchange functions at an F level of service, and has been rated as the eighth worst for delay in the MPO region, and second worst in the MetroWest region. Beyond the traffic demands, this interchange has also been identified as a high-crash intersection; currently ranking #3 on the 2007-2009 Statewide Top 200 Intersection Crash List. In the same document, the interchange is also ranked a Top Pedestrian Crash Cluster from 2002-2009.

Improving this interchange has implications for surrounding land use and economic development, because it is located in Framingham's central business district, a designated redevelopment district. As such, interchange improvements are expected to facilitate redevelopment, encourage revitalization of several nearby brownfields, and improve pedestrian and bicycle access.

The Town of Framingham has been proactive in addressing the problems at this intersection. The Downtown Rail Crossing Task Force, a group composed of municipal officials, employees, and concerned citizens is looking at potential solutions to the challenges associated with the Route 126/Route 135 intersection.



Beyond this justification for the redesign and reconstruction of this interchange, there is a pressing urgency to address this situation, due to the successful conclusion of negotiations with CSX to increase commuter rail services west of Framingham. This expansion of service on the Worcester/Framingham Line scheduled for September 2012, will only exacerbate the ongoing congestion and traffic difficulties at this interchange.

The Partnership is intrigued by the section of the Recommended Plan entitled, "Projects Included in Other MPO Areas". While we appreciate the endorsement of the Boston MPO for such projects as the Fitchburg Commuter Rail Line (Montachusett MPO) and the Interchanges at I-495/I-90 and I-495/Route 9 (Central Massachusetts MPO), the lack of financial commitment to projects which include several Boston Region communities is striking. We understand through our long-standing role on the Fitchburg Line Working Group that the funding for the Fitchburg Line project is unique in its combination of Small Starts, ARRA, and state funds and therefore, it may not be appropriate to include it in the Boston MPO's TIP or LRTP. However, it seems not only imperative but incumbent upon the Boston MPO to share in funding the Interchanges at I-495/I-90 and I-495/Route 9, considering that two of the three affected communities are actually in the Boston Region, namely, Southborough and Hopkinton.

As a result, we urge the Boston MPO to approach MassDOT and the Central Massachusetts MPO about new and creative mechanisms for funding multi-jurisdictional projects. This approach is necessary to develop coordinated responses to regionally significant needs and to secure the additional funding necessary to radically accelerate such projects' scheduling. The timing for such coordination is even more appropriate given the ongoing work by the two regional planning agencies, CMRPC and MAPC, with the Executive Office of Housing and Economic Development (EOHED), the Partnership, Mass Audubon, and the MetroWest Regional Collaborative, on the 495/MetroWest Development Compact. The 495/MetroWest Development Compact is creating a shared framework for state, regional, and local strategies for priority development and land preservation as well as transportation and other infrastructure investments in the 37 municipalities in the region, a region that includes the Interchanges at I-495/I-90 and I-495/Route 9. Further, MassDOT has just begun work on the I-495/Route 9 Interchange Improvement Study, which includes both interchanges. Given all of this work and collaboration, it seems an ideal time to discuss a way to jointly fund a project at these critical interchanges, rather than relying upon the Central Massachusetts MPO to fully fund a project in which two of the three affected communities are in the Boston Region MPO.

We urge you and the other members of the Boston MPO to recognize that these interchanges warrant a higher priority listing in order to address major congestion, safety, air quality, and sustainable development issues. The movement of people and goods pays no attention to the MPO boundaries, and it is time that the state, the Central Massachusetts MPO, and the Boston MPO recognize this reality by planning accordingly.

The Partnership recognizes the time and effort that went into the Draft Needs Assessment or Volume 2 of *Paths to a Sustainable Region*. The value of the demographic data on the various corridors and particularly the Circumferential Corridors cannot be overstated. Nevertheless, we have concerns about some glaring omissions on the Corridor Bottlenecks list (Table 3-1), namely, the interchanges discussed above: I-495 /I-290/Rte 85 Interchange in Hudson and Marlborough, and the Interchanges at I-495/I-90 and I-495/Route 9. While two of these three interchanges are recognized as Trucking Mobility Issues (p. 3-12), it does not explain why they are not included as Freeway Corridor Bottlenecks. Some clarification on why the interchanges were not included would be much appreciated.

It should also be noted that under the Existing Conditions section of Circumferential Corridor Needs Assessment that the MetroWest/495 Transportation Management Association is not listed with the other existing TMA's (p. 9-5) in the Corridor.

Finally, while the Partnership recognizes the reason for dropping the Illustrative List from the LRTP, we are concerned by not only the message it sends but also the confusion possibly resulting since there is still an Appendix B/Universe of Project lists. We feel this list is important but is likely to be confused with the Illustrative List. Further, there is no clear explanation for the differences between the side-by-side Universe of Projects List and the Needs Evaluation. If the Needs Assessment is the new guide for the MPO's "decision making about how to address the region's needs through the LRTP and for future decision making about which projects to fund in the TIP and which studies to conduct through the UPWP", then projects previously on the Universe of Projects list that are not included in the Needs Evaluation list are no longer considered a priority for the Boston MPO. As such, the Partnership is alarmed by the following discrepancies:

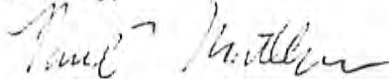
- I-495 Capacity Improvements (Littleton to Wrentham) - Northwest, West and Southwest Corridors Highway
- Fitchburg Line Improvements - Northwest Corridor Transit
- Fitchburg Line Interlocking Project - Northwest Corridor Transit
- Boundary St./Goddard St. (Marlborough, Northborough) - West Corridor Highway
- I-495/South St. New Interchange (Hopkinton) - West Corridor Highway
- Rte. 16/27 (Sherborn) - West Corridor Highway
- Rte 9/I-495 Interchange (Westborough) - West Corridor Highway
- Cordaville Road/Rte 85 Rehabilitation (Southborough) - West Corridor Highway
- Commuter Rail Station on I-495 in MetroWest Area (Westborough) - West Corridor Highway
- Bicycle and Pedestrian Improvements in the vicinity of Norfolk Commuter Rail - Southwest Corridor Highway
- Bicycle and Pedestrian Improvements in the downtown Franklin - Southwest Corridor Highway

There are several projects which are included on both lists within the 495/MetroWest region and the Partnership appreciates the continued recognition of these projects by the Boston Region MPO, including but not limited to:

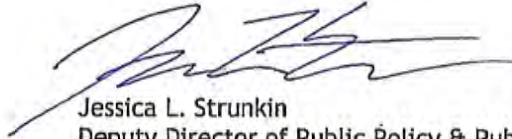
- Route 2 Interchange (Littleton) - Northwest Corridor Highway
- Route 126 (Bellingham to Framingham) - West Corridor Highway
- Route 1 Intersection Signalization (Corridorwide) - Southwest Corridor Highway
- Extend Franklin Commuter Rail Line to Milford - Southwest Corridor Transit
- Operate Weekday Commuter Rail Service to Foxborough - Southwest Corridor Transit

We appreciate your consideration of our commentary on the LRTP and would welcome any questions, which should be directed to Jessica Strunkin at (774)760-0495 x. 103 or [Jessica@495partnership.org](mailto:Jessica@495partnership.org) . Thank you for your efforts in planning the use of scant resources for many worthy projects, as well as for your time and consideration.

Sincerely,



Paul F. Matthews  
Executive Director



Jessica L. Strunkin  
Deputy Director of Public Policy & Public Affairs





*Sustainable Region* does not appear to share the same emphasis. The Current Approach is based on the approach taken in the *Journey to 2030* plan, which may not be responsive to today's visions and needs.

The selection of projects in the plan for 2035 as it is currently presented misses an opportunity to closely respond to the great analytical effort of its detailed Needs Assessment for the near term, and does not consider a big-picture, long-term view that goes beyond the current, highly constrained funding environment.

We believe that a more effective strategy for directly addressing needs would have been something like "Strategy 3: New Mix of Projects and Programs," as described in the plan as an attempt to "pull into the Long Range Transportation Plan a more diverse set of projects and a more varied set of programs based on identified needs" and focus "on lower-cost projects [that] would provide the flexibility to address mobility and other needs in many geographic areas of the MPO region."

The LRTP may be too far along to make major changes at this point, but it would be worthwhile to consider supplementing the list of projects by returning to a strategy adopted by the previous long range plan *Journey to 2030* completed in 2009. The rationale for identifying Illustrative Projects in 2009 remains sound as stated at that time. If indeed the list of selected projects using the "Current Approach" strategy in the 2011 plan reflects the priorities established in 2009, then it still makes sense that the response to limited resources two years ago, listing "Illustrative Projects," remains valid today. *Journey to 2030* convincingly argued for including "Illustrative Projects" for the following reasons:

- "Illustrative projects are defined as projects that meet the MPO's criteria for selection, but which are not included in the recommended list of projects because there is not sufficient revenue to fund them."
- "To stay competitive with other geographic regions across the country and throughout the world, the greater Boston region must fund enhancements that increase capacity of the existing system as well as expanding it. These projects will foster quality of life improvements and economic prosperity by relieving traffic congestion, improving the movement of people and goods, and linking employment centers to provide employees with better mobility options."
- "The illustrative projects identified [in the 2009 plan], although unfunded in this [plan], are important elements of the region's future transportation system. They include projects with significant regional benefits and projects that invest in important existing infrastructure. They are also needed to fully attain the region's visions and goals..."
- "The MPO intends to continue working with state and federal partners to advance these projects, in order to be prepared for the future."

The following comments continue the theme of including projects in the LRTP that address identified current needs and look toward visions of a longer run future, when additional resources will be available to help to realize those visions.

## **Chapter 2: Visions and Policies**

We suggest that you reconsider several possible illustrative projects that better address the following visions and needs documented in the chapters of this report.

The MetroFuture plan provides strong guidance for how to proceed. Some of the MetroFuture transportation goals cited in the LRTP include:

- Expanding the transit system in both urban and suburban areas
- Increasing the transit travel mode share
- Providing options to avoid congestion
- Reduced vehicle miles traveled
- Linking land use and transportation

These goals can be more effectively met by directing more investment to transit projects.

A policy of *Journey to 2030*, cited in this plan as a foundation for current policies, stated that “The MPO must match investments with identified regional needs and must fund the services, programs, and projects that are most effective and financially feasible for addressing those needs.”

The current plan identifies areas for new or additional emphasis in MPO planning, including:

- Working with limited financial resources [which suggests choosing the most cost effective projects would be a worthwhile consideration]
- Increasing transit and other “healthy transportation” mode shares

Some relevant visions and policies described in the current plan that should receive emphasis in selecting projects for the plan are:

- “Expansion of the system will come through strategic investments...” including developing low-cost strategies.
- Livability vision: “Transportation investments will focus on existing activity centers, including sites of economic activity and adequate public infrastructure, where density will be encouraged....This density and mixed-use activity will better support new and increased transit services.”

[Note that in the current economic conditions, commercial and industrial activities mentioned in the LRTP may be surpassed as major drivers of the regional economy by the “Eds and Meds” institutional uses and by institutional and private research centers that should be considered when identifying current and future activity centers.]



- Emphasis on federal planning factors of enabling global competitiveness, protecting and enhancing the environment; enhancing the integration and connectivity of the transportation system across and between modes.
- Mobility vision policy: “Strengthen existing and create new connections within and between modes.”
- Environmental vision policies: “Improve transportation in areas of existing development, which will reduce pressure to develop greenfields and possibly support development that will clean up brownfields for productive use.”
- Transportation equity vision policies: “Reduce trip times for low-income and minority neighborhood residents and increase transit service capacity.”
- Climate change vision policies: implement actions for reducing vehicle miles traveled.
- Use of the visions and policies in decision making: “The visions and policies, in addition to having guided the selection of the projects and programs in this LRTP... will be integrated into the MPO’s ongoing planning process...”

### **Chapter 3: Needs Assessment**

The Needs Assessment summarized in Chapter 3 of the draft final plan identifies several critical shortcomings in the existing transit system that should be addressed, many of which are in the Central Area, described in Chapter 3 as “the hub of the radial corridors and the central and major activity center of the region.” Some of the critical needs include:

- Several transit mobility needs of critical importance summarized in three categories: “alleviating system constraints, filling gaps in the existing system, and expanding the system to meet demand.”
- Reliability problems related to several major infrastructure constraints are described in Chapter 3 as placing limits on capacity and hindering the ability to expand the transit system.
- Some capacity constraints include:
  - Lack of adequate commuter rail platforms at Ruggles Station.
  - The Green Line Central Subway is currently operating at capacity, and the Orange Line is overcrowded at peak hours between the core stations.
- Current and future gaps in the MBTA system that could benefit from additional service include:
  - High trip volumes between Somerville and Cambridge.
  - Densely populated areas in Chelsea, Everett, and Medford that currently generate significant numbers of trips into the urban core but do not have frequent and convenient transit access.

- Transit connections are difficult between East Boston and the North Shore and Kendall Square and Harvard Square in Cambridge.
- Transit connections between Cambridge and the Financial District near State Street are also difficult.
- MBTA travel from Back Bay, Roxbury, Fenway, Brookline and Newton to the South Boston waterfront and Logan Airport now require a “three-seat ride.”
- “More frequent, circumferential, rapid and through-routes connections would greatly enhance mobility between Central Area activity centers...”
- Expansion to meet demand when additional service gaps may emerge, according to the Needs Assessment and transportation modeling conducted by the MPO, as the population grows and its characteristics change, including:
  - Ridership demand on the Green Line, which by 2030 is projected to exceed capacity on surface branches and the Central Subway if two-car trains are still in use.
  - Higher transit demand resulting from implementation of the MetroFuture land use plan that will require investments to increase capacity.
  - By 2030, growth in trips is projected in several areas that currently have limited transit services. Planned major development projects that are expected to rely heavily on transit access will increase transit ridership and demand for additional service.
- Transportation equity considerations identified in Chapter 3 also need to be addressed, including:
  - “Better circumferential transit service and a connection between the Red and Blue lines are needed.”
  - Densely populated areas such as Roxbury, Somerville, Chelsea, Medford, and Everett lack convenient access to rapid transit.
  - “Transit service is focused on travel to or from Boston, and can be inadequate for travel within communities outside of the Central Area.”
- Land use visions of MetroFuture include an emphasis on locating new development in developed areas served by transit lines rather than in greenfields. Chapter 3 states that these visions may require expanding transit capacity to meet service demands. Some of the new developments include the South Boston Waterfront, Assembly Square, and North Point, as well as expanding existing centers in Longwood, the Fenway, and Kendall Square where robust growth continues.

Chapter 3 concludes that these and other needs were a major consideration for the MPO in selecting the set of major infrastructure projects included in the plan.

## Suggested Illustrative Projects

The result of these vision and policy statements, and the Needs Assessments cited in chapters of the plan and summarized above presents a clear case for several other projects that can be made priorities and included in the final plan in some capacity, either as Illustrative Projects or future amendments to the plan.

- **The Urban Ring:** can and should be implemented incrementally in small segments as resources are available. The Urban Ring addresses each of the needs listed above well: increasing capacity, filling gaps, providing expansion to meet ridership demand, addressing transportation equity, and supporting the land use visions of MetroFuture. It addresses energy conservation, climate change, and other environmental objectives while supporting compact growth plans of the communities through which it passes. At the completion of Phase 2, the Urban Ring is projected to serve 184,000 riders per day and divert 41,500 vehicle trips per day.
  - It is important to note that the Urban Ring should not be viewed as one monolithic mega-project because it can be implemented by completing elements that have independent utility as resources are available over time.
  - In recognition of highly constrained resources, we have identified a small number high priority segments proposed as early actions, some of which are in the current plan or are being implemented already:
    - East Boston/Chelsea improvements to serve a significantly underserved corridor. Improvements are already underway with construction by Massport of the East Boston/Chelsea Bypass Road and the study of a possible extension of Silver Line service to Chelsea.
    - Filling the gap noted in the Needs Assessment between the Orange Line at Sullivan Square and the Red Line at Kendall via Lechmere and the Green Line. Service in this segment can address near term anticipated growth in Kendall Square, reduce congestion in the Central Subway, and provide air quality benefits in the Green Line Extension corridor as we await realization of the benefits promised by the recently delayed Green Line Extension. When the Green Line Extension is operating, the Urban Ring can make connections that will relieve pressure on the Central Subway.
    - The LRTP already includes exclusive bus lanes at Sullivan Station that will facilitate movement of future Urban Ring BRT buses in the area and is an example of the incremental changes



that can take place over time in other portions of the Urban Ring alignment.

- Melnea Cass Boulevard: to serve the Lower Roxbury community and improve bus connections between Ruggles and Boston Medical Center.
- Surface BRT service in the Longwood and Fenway area: where both the travel demand and the level of congestion are high.
- Traffic signal prioritization and queue jump lanes as part of bus lanes and in mixed traffic situations in locations such as Cambridgeport, the South End, and Columbia Point.
- **Silver Line Phase III**: to make better connections between Roxbury, The Back Bay, Brookline and Newton to the South Boston waterfront and Logan Airport noted in the Needs Assessment. Implementation of **T Under D** to improve Silver Line operations and traffic conflicts in South Boston.
- Continue **design of the Red Line/Blue Line Connection** to make the connections cited in the Needs Assessment between East Boston and the North Shore and Cambridge, and between Cambridge and the Financial District while reducing Central Subway congestion.

We wholeheartedly concur with the conclusion reached by the MPO two years ago that it is important to continue to advance these projects with whatever funds are available in the near term, so that when sufficient funds are available in the future for implementation, each project will be ready to take the next step. Therefore, we feel that they should be identified in the plan and could be designated as Illustrative Projects.

## **Chapter 6: Environmental Justice**

These proposed projects also address the following issues listed in the Environmental Justice areas identified in the LRTP through which the projects pass:

- “Circumferential transit service is poor in the Central Area.”
- “There is no connection between the Red and Blue lines.”
- Densely populated areas such as Roxbury, Somerville, Chelsea, Medford, Everett...lack convenient rapid transit.

The LRTP notes that “the potential impact of a proposed project on an Environmental Justice area is a criterion in the LRTP and TIP project ranking process.” Criteria for projects include:

- Improves transit for an Environmental Justice population
- Design is consistent with complete-streets policies in an Environmental Justice area
- Addresses an MPO-identified Environmental Justice transportation issue

## **Chapter 7: The Financial Plan**

We recognize that, as the Plan states in Chapter 7, “Many projects that would contribute greatly to achieving the transportation visions and goals of *Path to a Sustainable Region* cannot be funded with revenue and funding currently projected to be available.” However, priorities should be established that select the best and most cost effective projects that address the visions and needs stated in the plan.

While the Boston MPO concurs with the MBTA’s decision “that all revenues during the LRTP time period will be used to maintain the system in a state of good repair. The MBTA is not proposing any new expansion projects at this time...”, this decision may not serve all of the interests of the region well. Is this a reasonable assumption for the next 25 years? Not if the Commonwealth chooses to invest additional resources to meet the needs stated in this plan, or if the Commonwealth decides to relieve the MBTA of a portion of its burden of debt. These assumptions may be subject to modification in the future if the MBTA funding picture changes.

## **Chapter 8: The Recommended Plan**

As described above, we disagree with some of the choices made in the project selection process as it continues implementation of the “Current Approach” strategy by funding prior commitments made in previous LRTPs instead of focusing on the analysis of current needs. In order to add some balance to that approach, we urge the MPO to use a portion of the 42% of the funds that are unassigned to support other low cost projects, such as elements of the Urban Ring that most directly address the stated visions and needs. We also urge the MPO to consider a selection of these elements for implementation in the event that additional funding is available in the future, by amending the Long Range Transportation Plan and in future editions of the plan.

To be consistent with the stated goals, visions, and needs adopted by the MPO in this plan, a far greater proportion of the available funds should go to transit expansion: more than the 8% in this plan as compared to the 42% of the funds designated for roadway expansion. The \$1.02 billion in major expansion projects in the plan include a variety of highway projects distributed geographically across the region, but only a small number transit expansion projects. This allocation of resources seems contrary to spirit of the MetroFuture plan with its emphasis on transit and compact development.

## **Travel Demand Model Results**

We have raised concerns in the past about the travel demand model, but we concur with the modeling that indicates transit trips (30% increase) are expected to grow faster than auto trips (7% increase) by 2035. As the plan states, this shift results in part from a greater concentration of activity near transit service. This analysis further supports a strategy that provides more expansion for transit than is indicated in this plan. The model’s projections may undercount the potential demand for transit

ridership because of the lack of robust transit expansion represented by projects included in the plan.

## **Conclusion**

It is unlikely that today's financially constrained environment will continue unchanged for the next 25 years. Over that period, the federal funding landscape and programs may change in directions that cannot be predicted today. Priorities of the Commonwealth and methods for funding projects may evolve to complement or supplement federal programs. At some point in the future, additional resources will become available, and we need to plan for that time. It will be important that transportation projects are programmed and ready to proceed that not only will effectively address near term needs, but also will support implementation of the MetroFuture plan and its vision of a more compact, sustainable development pattern. Attaining goals for environmental justice, enhanced mobility, sustainability, and economic development also call for support of an ambitious long term strategy. This support will require greater investment in transit if current trends continue, both to maintain the existing system and to expand the system into underserved areas and locations where development should be directed.

We encourage the Boston MPO to develop a truly long term strategy that will lay out a method for implementing the visions and goals that are well articulated in *Paths to a Sustainable Region* as well as contingency plans and programs that will continue advancement toward those ends even at a slower pace during periods of declining resources.

Additional resources will not come at a steady or even predictable pace; therefore, we believe that projects need to be defined in a way that allows staged implementation that can be matched to the pace of funding. We believe that the concepts that have guided our comments included in this letter on the current long term plan can be adopted to guide the efforts of the MPO as it works toward the long term view.

Sincerely,



Richard A. Dimino  
President and CEO





Mike Gowing, Chairman  
Board of Selectmen

**TOWN OF ACTON**  
472 Main Street  
Acton, Massachusetts 01720  
Telephone (978) 929-6611  
Fax (978) 929-63500  
[bos@acton-ma.gov](mailto:bos@acton-ma.gov)  
[www.acton-ma.gov](http://www.acton-ma.gov)

September 12, 2011

David Mohler, Chair  
Transportation Planning & Programming Committee  
Boston Region Metropolitan Planning Organization  
10 Park Plaza, Suite 2150  
Boston, MA 02116

**RE: Assabet River Rail Trail (ARRT)  
Bruce Freeman Rail Trail (BFRT)**

Dear Mr. Mohler:

Once again we would like to express our appreciation for the work and time that the MPO and its staff have invested in preparing the Draft FFYs 2012-15 Transportation Improvement Program (TIP) and the Draft of Paths to a Sustainable Future, the 2012-2035 Long Range Transportation Plan (LRTP). Both are now posted for public review and comment until September 13, 2011. Therefore, we wish to restate our strong and determined support for the Assabet River and the Bruce Freeman Rail Trails.

Assabet River Rail Trail (ARRT)

The TIP lists for 2012 the remaining ARRT Federal earmark funds (High Priority Projects – HPP 1761). Thank you! As Acton is the lead community for this project engaged in facilitating the design process in Acton, Maynard, Stow and Hudson, we can assure you that having it listed in the TIP makes it a lot easier to move the project forward quickly.<sup>1</sup> We ask that it remains listed for 2012 in the Final FFY 2012-15 TIP.

The LRTP shows the anticipated construction funding for the ARRT (Hudson to Acton) in the 2016-2020 time band (\$23,830,000). Thank you! We ask that the ARRT remains firmly placed in this position in the Final LRTP for the region. The design work for the Acton-Maynard section is well under way; MassDOT Agreement #62931 funds the complete design for this section. We

<sup>1</sup> However, the actual amount of remaining HPP funding may be less than the number shown in draft TIP.

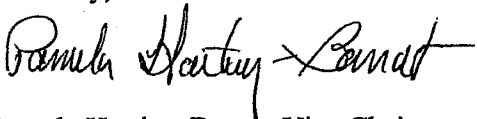
have recently amended our contract with the design engineer to add preliminary design work in Stow. With the HPP funding listed in the TIP for 2012 we intend to coordinate with Stow to move aggressively forward with the design in Stow.

Bruce Freeman Rail Trail (BFRT)

The LRTP shows the anticipated construction funding for the BFRT (Concord to Westford) in the 2021-2025 time band (\$29,940,000). Thank you! We ask that the BFRT remains firmly placed in this position in the Final LRTP for the region. We have MassDOT Agreement #64287 that funds the complete design for the project phases 2A and 2C. Phase 2B is funded through the 25% design stage.

The Town of Acton is committed to the completion of both trails and counts on the continued MPO support in this endeavor.

Sincerely,



Pamela Harting-Barrat, Vice Chairman  
Board of Selectmen

cc: Anne McGahan, CTPS  
Sean Pfaelzer, CTPS  
Towns of Maynard, Stow, Hudson, Concord, Westford, Carlisle  
City of Marlborough  
Thomas Kelleher, ARRT, Inc.  
Tom Michelman, Friends of the Bruce Freeman Rail Trail  
Senator James Eldridge  
Representative Kate Hogan  
Representative Jennifer Benson  
Representative Cory Atkins  
Congresswoman Niki Tsongas  
Jane Adams, Regional Coordinator for Niki Tsongas



**TRANSPORTATION ADVISORY COMMITTEE**

Arlington Planning Department, 730 Mass Ave,  
Arlington, MA 02476, c/o Laura Wiener

September 13, 2011

Ms. Christine Kirby, Mass Department of Environmental Protection  
Mr. Jerome Grafe, Mass Department of Environmental Protection  
Mr. David Mohler, Chair, Boston MPO Planning & Programming Committee  
Ms. Katherine Fichter, MassDOT Office of Transportation Planning

RE: Green Line Extension delay

Dear Ms. Kirby, Mr. Grafe, Mr. Mohler, Ms. Fichter, and the Boston MPO Staff

As Co-Chairs of the Town of Arlington's Transportation Advisory Committee, we would like to express our concerns regarding the intentions of the Massachusetts Department of Transportation to further delay the Green Line opening to 2018-2020.

Recent revisions called for a proposed limited extension of the Green Line only to College Avenue, Medford by the end of 2014. The Town of Arlington remains strongly in favor of any and all efforts to continue the proposed extension to the Route 16/Mystic Valley Parkway location as part of the original Phase I construction. The Route 16/Mystic Valley Parkway terminus would clearly provide the best location for many Arlington residents to use the Green Line Extension and thereby greatly increase the number of riders using the T.

The reduction in vehicles miles traveled for Arlington residents with access to the planned Route 16/Mystic Valley Parkway terminus (who may now have little choice but to drive into Boston via Route I-93), together with improvements to air quality and the many other environmental, economic, and social benefits of increased access to public transportation directly into Boston are all commendable features. There is no question that Arlington residents who work in and near Boston, and who currently either drive to Boston or make use of multiple modes of other public transportation, would utilize the new station, given its proximity to East Arlington and Arlington Center.

**Transportation Advisory Committee Members:**

Elisabeth Carr-Jones, Wayne Chouinard, Jean Clark, Steve Kurland, Jeff Maxtutis, Howard Muise,  
Officer Corey Rateau, Scott Smith, Edward Starr, Richard Turcotte, and Laura Wiener

Web site; [www.arlingtonma.gov/tac](http://www.arlingtonma.gov/tac)



The extension of the regional Minuteman Path bike and pedestrian network contemplated as part of this Green Line project would likewise benefit Arlington residents and visitors by encouraging greater usage and providing additional opportunities for the public to utilize alternatives means to travel to and from downtown Boston.

We are concerned that the most recent announced delays to the longstanding SIP transit commitments violate the spirit and intent of the original plans to provide sustainable public transportation in accordance with the MassDOT's own principles and obligations. Further delays, inconsistent with commitments already made by public officials and agencies, again deny area residents the many health, transportation, and economic benefits anticipated by this project.

To postpone completion of this vital project calls into question the intentions of MassDOT to honor its legal and civic obligations. All state residents will bear the burdens of additional costs resulting from this unwarranted delay.

We are strong proponents of efficient public transportation, and strongly encourage the enforcement of existing obligations to complete the Green Line Extension Project to Route 16/Alewife Brook Parkway without further delay.

Sincerely,

Howard Muise and Jeffrey Maxtutis  
Transportation Advisory Committee  
Town of Arlington

Cc: Ms. Anne Arnold, Manager, EPA Region 1 Air Quality Planning Unit  
Mr. Donald Cooke, Conformity and mobile monitoring, EPA Region 1 Air Quality  
Ms. Rosemary Monahan, EPA Region 1 Smart Growth Coordinator  
Ms. Pamela Stephenson, MA Division Administrator, Federal Highway  
Mr. Michael Chong, Federal Highway Planning and Environ. Program Manager  
Ms. Mary Beth Mello, Regional Director, Federal Transit Region 1

**Transportation Advisory Committee Members:**

Elisabeth Carr-Jones, Wayne Chouinard, Jean Clark, Steve Kurland, Jeff Maxtutis, Howard Muise, Officer Corey Rateau, Scott Smith, Edward Starr, Richard Turcotte, and Laura Wiener  
Web site; [www.arlingtonma.gov/tac](http://www.arlingtonma.gov/tac)



CITY OF CAMBRIDGE • EXECUTIVE DEPARTMENT

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*Robert W. Healy, City Manager*

*Richard C. Rossi, Deputy City Manager*

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September 12, 2011

David Mohler  
Boston MPO Executive Secretary  
10 Park Plaza  
Boston, MA 02116

RE: RTP "Paths to a Sustainable Region, 2035"

Dear Mr. Mohler:

Thank you for the opportunity to comment on the MPO's Draft Regional Transportation Plan "Paths to a Sustainable Region, 2035" (RTP).

I would like to commend CTPS and the Boston MPO on preparing and including a thorough and analytical Regional Needs Assessment in the Long Range Transportation Plan. While I recognize that transportation funding available for our region from state and federal sources is woefully inadequate, there is an unfortunate disconnect between the needs assessment and where the RTP is directing the scarce resources that are available for our region. In the face of such dire fiscal times, I respectfully disagree with the MPO regarding its strategy of honoring previous project commitments regardless of whether or not they help achieve our region's most pressing mobility needs. The ability of our region's economy to grow depends largely on the efficiency and effectiveness of our transportation system.

The regional projections for mobility needs by the year 2035 indicate that there will be a 7% increase in demand for our roadways and a 30% increase in demand for transit service. Higher transit demand resulting from the implementation of the MetroFuture land use plan will require investments to increase capacity of our already stretched transit system. Chapter 2 of the RTP provides vision statements and policies that support the prioritization of projects that maintain and improve public transportation facilities and services, so as to increase public transportation mode share and reduce reliance on automobiles. The RTP does not allocate our limited regional funds on projects that will achieve these policy objectives.

The MBTA Red-Line carrying 250,000 riders per typical weekday is a critical transportation service for those who live and work in the City of Cambridge and is

identified in the Regional Needs Assessment as requiring significant capital investment. Old switching systems and old railcars cause regular service delays and poor on-time performance. 60% of Red-Line cars are over 22 years old, and the 74 cars built in 1969 need to be replaced. Red Line track / switch upgrades and procurement of new Red Line cars are not included in the RTP. Maintenance issues such as the seriously deteriorated portal at the base of the Longfellow Bridge also put the future capacity of the Red Line in jeopardy. In addition, four of the bus routes that operate in Cambridge (#1, #47, #66, and #71), all with significant ridership, fail the "vehicle load standard" which occurs when there is excessive crowding. These problems, left unaddressed, will only continue to deteriorate as we reach the year 2035.

I am pleased to see that the MPO has included partial funding for the Green Line Extension project and urge the MPO to continue to support this critical transit project and consider additional funding as needed to get the project operating as quickly as possible, in the face of increasingly painful delays.

It is understandable that the Urban Ring Phase 2 project is not included in the fiscally constrained portion of this RTP, but I am pleased that it is included in the short list of Illustrative Projects. While difficult to think about transit expansion at this time, it is critical to recognize that this is needed to maintain a healthy economy into the future, and to continue forward with the planning process for expansions.

The City is also concerned that the plan does not go far enough to further State of Massachusetts environmental goals. The recent Global Warming Solutions Act had the Commonwealth set a goal of reducing GHG emissions by between 10% and 25% below 1990 levels by 2020. The July 2009 report by the Mass. Department of Environmental Protection predicts that a very significant increase in transportation emissions will occur by 2020 under a "business as usual" scenario. Prioritizing projects that support non-motorized transportation modes, as opposed to highway capacity expansion projects, is a critical component to meeting statewide GHG reduction goals.

Thank you for the opportunity to comment on this document. I appreciate the MPO's support for continuing to work toward a sustainable transportation plan that meets and surrounding communities. Please contact Jeff Rosenblum with any questions you might have at (617) 349-4615. Thank you.

Very truly yours,

A handwritten signature in black ink, appearing to read "Robert W. Healy". The signature is fluid and cursive, with a prominent loop at the end.

Robert W. Healy  
City Manager



## Community Corridor Planning

September 13, 2011

To:

Mr. Jerome Grafe, MA DEP

Ms. Christine Kirpy, MA DEP

Mr. David Mohler, Chair, MPO Planning and Programming Committee

Ms. Katherine Fichter, MassDOT Office of Transportation Planning

The Community Corridor Planning Group and its Advisory Team stands with the city of Somerville and other local community groups to urge the state and federal authorities to move forward on the Green Line extension (GLX) without delay – thus enforcing the SIP air quality and Transportation Conformity Measures in the Boston MPO 2012 – 2015 TIP and LRTP.

Community Corridor Planning (CCP) is a grassroots participatory planning initiative led by 16 resident members and coalition partners including Somerville Community Corporation, Groundwork Somerville, Somerville Transportation Equity Partnership, Friends of the Community Bike Path, and the Somerville Community Health Agenda. Since 2009, we have been hard at work to engage over 1000 residents of Somerville in the visioning and planning of the GLX corridor in Somerville.

Through door-knocking, house meetings, large community meetings, station design workshops, land use envisioning workshops, interactive mapping, and other efforts we have motivated hundreds of people who have traditionally felt disenfranchised from public planning to get involved. Many of those involved had not realized the Green Line would be coming to Somerville until we knocked on their doors. Our work has given people the enthusiasm and civic spirit to restore people's faith and hope in true democratic participation. **A delay in the Green Line of this nature threatens to disengage people from public participation and increase a collective sense of skepticism in a way that severely undermines public planning.** We have done our part over these last few years to contribute organizational resources, time, and hundreds of volunteer hours to take part in this exciting effort to include the community voice in this process, and request State and Federal authorities to uphold their end of the commitment by finishing the project without a delay beyond 2015.

The green line corridor is already suffering from the increased traffic and the accompanying pollution that the GLX was designed to elevate. The GLX is a sustainable transportation project that will address traffic density and air quality by reducing car trips and curbing greenhouse gases. The State's obligation under the Clean Air Act to complete the project by 2015 is an important factor driving CCP to ask the state to rescind the recently announced GLX schedule delay. However, the project's short and long-term economic benefits – realized both during construction and after completion – motivates our request as much or more.

The stakes are high: people stand to shorten their work day, and get to better jobs with the arrival of GLX, significantly increasing quality time home with families; asthma and other respiratory diseases may decline with more access to public transportation and decreased traffic congestion; school and

community amenities could significantly improve with added money to the City budget with new economic development in response to the Green Line; small businesses are positioned to grow and thrive with the arrival of the Green Line. Additional years of delay will be costly and burdensome to the entire community, both local and regional.

On behalf of the citizens of Somerville, including people who operate businesses, raise families, and who work and play in this diverse and vibrant city, we respectfully ask that the GLX project be expedited and returned to the 2014 schedule as previously mandated.

Sincerely,

Peter John Marquez  
On Behalf of the Community Corridor Planning Advisory Team

Aly Lopez,  
John Robinson,  
Bernal Murillo,  
Leanne Darrigo,  
Karen Molloy,  
Danny McLaughlin,  
Claudia Rabino,  
Peter Marquez,  
Sal Islam,  
Rosemary Park,  
Rolare Dorville,  
Edson Lino,  
Mekdes Hagos,  
Lenora Deslandes,  
Santiago Rosas,  
Shelia Harris,  
Sarah Shugars,  
Josh Wairi,  
Jen Lawrence

Cc:

Ms. Anne Arnold, Manger, EPA Region 1 Air Quality Planning Unit  
Mr. Donald Cooke, Conformity and Mobile Monitoring, EPA Region 1 Air Quality  
Ms. Rosemary Monahan, EPA Region 1 Smart Growth Coordinator  
Ms. Pamela Stephenson, MA Division Administrator, Federal Highway  
Mr. Michael Chong, Federal Highway Planning and Environment Program Manager  
Ms. Mary Beth Mello, Regional Director, Federal Transit Region 1





OLD NORTH BRIDGE

## TOWN OF CONCORD

BOARD OF SELECTMEN'S OFFICE  
22 MONUMENT SQUARE - P.O. BOX 535  
CONCORD, MASSACHUSETTS 01742

TELEPHONE (978) 318-3001  
FAX (978) 318-3002

August 22, 2011

Mr. David Mohler, Chairman  
Transportation Planning & Programming Committee, Boston MPO  
C/O Central Transportation Planning Staff  
10 Park Plaza, Suite 2150  
Boston, MA 02116

Re: Support for Draft Long-Range Transportation Plan

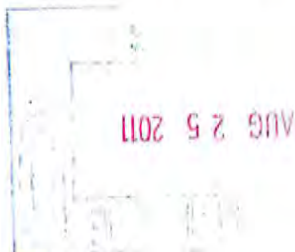
Dear Mr. Mohler:

On behalf of the Board of Selectmen and citizens of Concord, I am writing to express our appreciation for the Boston MPO's continued support of the Crosby's Corner and Bruce Freeman Rail Trail Projects by their inclusion in the Draft Long-Range Transportation Plan. Both projects have strong local support.

The Crosby's Corner Project will improve a vital transportation corridor and address long-standing safety concerns for travelers on Route 2.

Construction of the Bruce Freeman Rail Trail will help to improve traffic flow in Concord, promote transportation alternatives to automobiles, and support West Concord businesses. The Rail Trail will enable more commuters to transport themselves to the West Concord MBTA stop without driving or parking a car. It will allow children and families to bike (rather than drive) to school and playing field destinations without fear of riding in traffic. The Rail Trail will also provide Concord employees and customers of businesses along Route 2A in Acton an alternative to driving through Concord's most significant bottleneck: the Route 2 Rotary.

The designs for Phases 2A, 2B and 2C are funded and underway; portions may be ready for construction in the 2013-2014 timeframe. Should funding for Bruce Freeman Rail Trail construction become available prior to 2021-2025, Concord and the other communities adjacent to the trail would greatly benefit from its earlier construction.



Sincerely,

Elise Woodward  
Chair, Board of Selectmen



**Friends of the  
Bruce Freeman Rail Trail**

P.O. Box 1192  
Concord, MA 01742  
[www.brucefreemanrailtrail.org](http://www.brucefreemanrailtrail.org)

September 13, 2011

Mr. David J. Mohler  
Deputy Secretary for Planning & Chair of Boston Region MPO  
Boston Area Metropolitan Planning Office  
10 Park Plaza, Suite 2150  
Boston, MA 02116

Dear Deputy Secretary Mohler:

I, as President of the Friends of the Bruce Freeman Rail Trail, am writing to you as Chair of the Boston Region MPO Chair and Chair of the Transportation Planning and Programming Committee to request that the Bruce Freeman Rail Trail (BFRT Phase 2) be included in the Boston MPO's Long Range Regional Transportation Plan (RTP) as drafted for the 2021-2025 time slot.

The Friends of the Bruce Freeman Rail Trail (FBFRT) is a 501(c)(3) non-profit organization dedicated to construction of the 25-mile rail trail through the eight communities from Lowell into Framingham. The FBFRT has almost 500 dues paying members and 4,000 supporters, and a very active and supportive Board of Directors.

As you have been previously informed Phase 1 of the BFRT has been a huge success in Chelmsford and Westford in the NMCOG, but for the BFRT to even come close to reaching its potential as transportation and recreation corridor, it must be lengthened with the construction of Phase 2 through Westford, Carlisle, Acton, Concord and Sudbury.

Phase 2 of the BFRT will provide very important improvements to commuter access to West Concord MBTA station as well as commuter bus from the Colonial Liquor Plaza in Acton. Traffic back-ups constantly 1 mile and longer for commuters on 2A eastbound onto the Concord Rotary (in both morning and evening). The BFRT would give commuters an option to by-pass this gridlock and get to and from the West Concord train station and Sudbury, etc, and simultaneously decrease this congestion.

The BFRT will be used to substitute for many local automobile trips with its many destinations. The East Acton Great Road corridor will be accessible, West Concord will be accessible. Schools and ballfields will become safely accessible. This will increase the economic vitality of West Concord, East Acton, and Sudbury (if it can be re-added to LRTP at a later date)

The Phase 2 of the BFRT will be an important connection in growing but nascent web of active transportation networks in the Boston MPO. With the construction of Phase 2 of the BFRT commuters will be able to bike and walk safely to the West Concord train station, take the train, and then bike from North Station to work using the already successful Bike Share program.





## Friends of the Bruce Freeman Rail Trail

P.O. Box 1192  
Concord, MA 01742  
[www.brucefreemanrailtrail.org](http://www.brucefreemanrailtrail.org)

Thus it is very important Phase 2 of the BFRT is included in the 2021-2025 portion of the LRTP for the following reasons:

- BFRT has been allocated federal funds via the Statewide Enhancement Program. It is our understanding with the new federal policy, these design dollars cannot be used if a project is not scheduled in the first 10 years. The Patrick Administration has made clear its support for the BFRT Phase 2 project with the announcement of allocation of over \$900,000 in additional funds June 2011 to take the project through final design.
- Tomorrow, September 14, 2011, the kick-off meeting for the final design for Phases 2A (Westford, Carlisle and Acton) and 2C (Concord) design convenes.
- As a Community Path the BFRT will provide a wide array of benefits.
  - Bicycle and pedestrian projects provide an option an alternative to ever increasing cost of auto travel, in terms of saving on expensive gasoline (\$3.75/gallon gasoline ).
  - We need more Community Paths to create a network. Bicycle travel will not have a chance to really blossom until there is a network in place.
    - We have reviewed the estimates of usage forecast for five Community Paths and we believe given the circumstances the studies provide a decent but backward looking analysis that estimates the bare minimum usage of Community Paths.
    - With a better network, with higher gas prices, with more congestion, with more need for exercise, with more opportunities to use Bicycles at the end of the commute (Boston Bike Share Program), we will see very large increases in bicycle and pedestrian usage over current estimates.
  - We have a health crisis in our communities associated with our infrastructure that promotes sedentary nature. Community Paths encourage exercise of active transportation and helps fight the obesity epidemic.
  - Our constituents love Community Paths. Voters do not love highways or intersections or by-passes. The Boston MPO should place Community Paths at the top of their transportation priorities, not the bottom where they long have been dismissed as unimportant. 20 years, 50 years from now the building of bicycle and pedestrian infrastructure will be one of the most important decisions and will make the Boston area and Commonwealth a special place to live, work, recreate and visit.



**Friends of the  
Bruce Freeman Rail Trail**

P.O. Box 1192  
Concord, MA 01742  
[www.brucefreemanrailtrail.org](http://www.brucefreemanrailtrail.org)

Thank you for your consideration in this matter.

Sincerely,

*Thomas S. Michelman*

Tom Michelman – President Friends of the Bruce Freeman Rail Trail  
[www.brucefreemanrailtrail.org](http://www.brucefreemanrailtrail.org)  
6 Magnolia Drive  
Acton, MA



# TOWN OF HINGHAM

OFFICE OF SELECTMEN

John A. Riley, Chairman  
Laura M. Burns  
Bruce Rabuffo



Ted C. Alexiades  
Town Administrator

September 13, 2011

Mr. David Mohler, Chairman  
Transportation Planning and Programming Committee  
The Boston Regional Metropolitan Planning Organization  
Boston Metropolitan Planning Organization  
10 Park Plaza, Room 2150  
Boston MA 02116

Re: Response to Request for Comments on Draft FFY 2012-2015 Transportation  
Improvement Plan and Draft Long Range Transportation Plan (LRTP)

Dear Mr. Mohler:

Thank you for the opportunity to review the Draft FFY 2012-2015 TIP and Draft Long Range Transportation Plan (LRTP). On behalf of the Hingham Board of Selectmen I would like provide you with an update on the Town's efforts to have the **Derby Street Corridor Improvement Project** included on the TIP for FFY 2013-2016. (Derby Street is located within the MassDOT right of way and is not part of the Town's inventory)

As you may be aware, the Hingham Board of Selectmen has identified the commercial and industrial development along the Derby Street corridor as a critical goal for the Town and the region, and has identified the proposed improvements to the Derby Street Corridor as their number one infrastructure priority. In 2010 this project was submitted to Mass DOT's project review committee; it was then advanced to the Metropolitan Planning Organization at which point a secondary presentation was also well received.

Hingham's 2011 Town Meeting Article 24 resulted in the appropriation of \$75,000 for civil engineering services for the development of plans and specifications for the Derby Street improvements. The Town has also identified an additional \$75,000 in private funds, through a public/private partnership. The Town has undertaken solicitation of a consultant and is working closely with MassDOT to advance the project. The Town will be requesting construction funds for the project through the TIP program in the near future. The project cost is estimated at \$7.2 million dollars.

The area of work would include Derby Street from the Gardner Street/Derby Street/Whiting Street intersection (Route 53) to the Weymouth town line. The primary issues/needs in the corridor relate to roadway capacity, safety, promotion of alternative modes and economic



development. Roadway capacity concerns are most notable at the Gardner Street/Derby Street/Whiting Street intersection, which currently has the highest crash rate in the town and the Route 3/Derby Street interchange (Exit 15) which ranks among most problematic intersections in the Town.

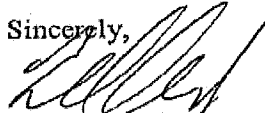
The stop-controlled ramp intersections with Derby Street were found to operate at a level of service (LOS) F during peak hours in 1997 and traffic volumes on Derby Street have grown 12% since that time. Existing gaps in the sidewalk network and a non-existent bicycle network in the Derby Street and Whiting Street corridors result in isolated neighborhoods. Finally, safety at the Gardner Street/Derby Street/Whiting Street intersection is a concern given the very high crash rate measured at this location.

This project would enhance mobility and safety for vehicular, bicycle and pedestrian traffic by upgrading the Derby Street and Whiting Street corridors. Generally, minor roadway widening would occur to provide bike accommodations in the traveled way, a two-way left-turn lane and a continuous sidewalk network. Realignment of the Derby Street/Whiting Street intersection would occur to address existing safety problems. A phased project is contemplated for the Derby Street/Route 3 interchange that would first involve signalization of the two ramp intersections with Derby Street.

Along with the Derby Street Project, the Board of Selectmen is interested in having the proposed improvements to Route 3A and the Hingham Rotary included in the next version of the Long Range Transportation Plan. This project is critical to addressing the existing documented hazards on this portion of Route 3A. This project also offers the promise of enhancing regional economic development by providing a vital connection between Hingham's Downtown and Hingham Harbor.

We look forward to speaking with you about these two projects in the near future.

Sincerely,



Ted C. Alexiades

# *Town of Hudson*

*Department of Community Development*

78 Main Street, Hudson, MA 01749  
Tel: (978) 562-2989 Fax: (978) 568-9641  
mciccolo@townofhudson.org



September 9, 2011

David Mohler, Chair  
Transportation Planning & Programming Committee  
Boston Region Metropolitan Planning Organization  
10 Park Plaza, Suite 2150  
Boston, MA 02116

**RE: Assabet River Rail Trail & the Long Range Transportation Plan**

Dear Mr. Mohler and Members of the Boston MPO:

On behalf of The Town of Hudson, I am writing to thank the Boston MPO for keeping the Assabet River Rail Trail (ARRT) in the Draft Long Range Transportation Plan (LRTP) in the 2016-2020 band. I urge you to keep this project in the Final LRTP for the region in the earliest available band. As you know, bicycle and pedestrian accommodations are essential elements of a sustainable transportation future. The Assabet River Rail Trail in particular is a valuable transportation route which links housing, downtown commercial areas, athletic fields, retail corridors, schools, and other key community facilities.

Inclusion of the ARRT on the LRTP acknowledges nearly twenty years of local efforts and public investment. Hudson and Marlborough received millions of dollars in state and federal funding to design, construct and complete the initial section of this transportation corridor. Hudson, Marlborough, Stow, Maynard and Acton have also collectively allocated substantial local dollars to advance this worthy project.

Despite the fact that the 5.5 miles of ARRT in Hudson and Marlborough are already completed, we in Hudson and Marlborough continue to work actively with our neighboring towns to ensure that the entire 12 mile trail will eventually be built and connected. Residents in Hudson look forward to one day being able to bike to the commuter rail station in South Action.

Thank you again for your continued support!

Sincerely,

Michelle Ciccolo  
Director of Community Development



MEDICAL ACADEMIC AND SCIENTIFIC COMMUNITY ORGANIZATION, INC.

People / Places / Plans / Future

*Via Mail and Email*

September 13, 2011

**Member Institutions**

- Beth Israel Deaconess Medical Center
- Brigham and Women's Hospital
- Children's Hospital Boston
- Dana-Farber Cancer Institute
- Emmanuel College
- Harvard Medical School
- Harvard School of Dental Medicine
- Harvard School of Public Health
- Immune Disease Institute
- Isabella Stewart Gardner Museum
- Joslin Diabetes Center
- Judge Baker Children's Center
- Massachusetts College of Art
- Massachusetts College of Pharmacy and Health Sciences
- Massachusetts Department of Mental Health
- Simmons College
- Temple Israel
- Wentworth Institute of Technology
- Wheelock College
- The Winsor School

**Associate Members**

- Blue Cross Blue Shield of Massachusetts
- Harvard Vanguard Medical Associates
- March Research Laboratories

David Mohler, Chair  
 MPO Transportation and Planning Committee  
 Boston Metropolitan Organization  
 10 Park Plaza, Suite 2150  
 Boston, MA 02116

RE: Comments on Draft Long Range Transportation Plan

Dear Chairman Mohler,

Thank you for the opportunity to comment on the draft of *Paths to a Sustainable Region*, the MPO's Long Range Transportation Plan. We commend the Staff of the MPO for the Plan's comprehensiveness, presentation and clear organization. The following supplements our previous letters (dated 6/8/11, 6/14/11 and attached) in regard to earlier draft chapters including the *Needs Assessment* and *Universe of Projects*.

***Financial Constraints***

We recognize that the current state of transportation funding in the Commonwealth greatly constrains the scope of projects recommended in the Plan. We understand the Plan's emphasis on addressing the backlog of maintenance and state-of-good-repair work needed for the highway and transit system, in particular the emphasis on essential needs such as the replacement of thirty and forty year old cars on the Orange and Red Lines and updating the 1920s era signals in the Green Line's Central tunnel. However, with a 25-year planning horizon, the Plan misses the opportunity to prioritize important projects which would address gaps in service and could be advanced in better financial times.

***Mismatch between Needs Assessment, Visions and Policies and Plan***

While it is essential to maintain the transportation system we have, the "Current Approach" strategy adopted in the Plan fails to fully address the mid-term and future transit needs that the Plan itself does a good job of identifying. This includes expanding the transit system, a key *Metro Future* transportation goal to fulfill the projected 30% growth in transit demand between now and 2035, predicted by the MPO's travel demand model. Moreover, the Plan allocates five times more funding for roadway projects at the expense of transit and should be more balanced.

The prior draft of the *Needs Assessment* clearly laid out the gaps in public transportation which affect the LMA and neighboring economic centers within the Central Area: including: "Congestion of the transportation system in this area constrains growth and economic development potential" and that "Circumferential travel... using the rapid transit system is constrained by the hub-and-spoke nature of the existing network"; that the Green Line Central Subway is currently operating at capacity; and out of 113 local bus routes, only six offer circumferential connections to the LMA and travel is often a three-seat ride.



***Eds and Meds, Research Centers as Major Economic Engines in Massachusetts Economy***

The LMA is at the heart of largest growth sectors in the State with over 2.7 million square feet currently under construction, permitted or proposed and 1,200 jobs added each year. As the second largest employment center outside downtown with congested roadways and limited parking, the Longwood Medical and Academic Area (LMA) is heavily dependent on the public transportation system, particularly the D and E branches of the Green Line which are currently at capacity. It is essential that when the Plan is next updated, it include long-term recommendations for expansion of transit services.

***Illustrative Projects***

To address mid and long-term transportation needs, the MPO must consider amending the Plan in the future to include *Illustrative Projects*, consistent with the prior *Journey to 2030 LRTP*. This approach acknowledges the constraints of the current economic climate and allows regionally-significant expansion projects to be included. It also takes a long-term view consistent with the 25-year timeframe of the plan and allows for the probability that the future transportation funding climate will improve. Failing to plan now for the large-scale transportation projects we need, Massachusetts will run the risk of losing out to other States in the competition for future federal transportation dollars which favor projects that have been incorporated in a State's MPO planning process, are well on their way to preliminary design and engineering, and are more shovel-ready to qualify for new types of program funding.

***Circumferential Services***

One such *Illustrative Project* is the Urban Ring, smaller or incremental components of which could be modeled for ridership and cost effectiveness. In whole or in part, this project provides circumferential services to fill the gaps identified in the *Needs Assessment*. Based on the modeling outcomes, the most promising could be phased into subsequent drafts or updates to the Plan. Suggestions for modeling, which would benefit the "Central Area" in general and the LMA in particular include: Ruggles Station Platform improvements, Melnea Cass Boulevard center median busway, Mountfort Street Corridor improvements, Albany Street bus lanes in Boston, short term cross-town bus service improvements to the LMA from Sullivan Station to JFK/UMass station and an alternative LMA tunnel for long range BRT service.

In summary, we appreciate the challenging task confronting the MPO and the Boston region with many immediate transportation needs and with such limited financial resources. However, the Plan represents an opportunity to look beyond current fiscal constraints and plan for the future when funding will improve and the Boston region will be in a position to advance the projects that will address the significant gaps and capacity constraints in the Central Area public transportation system.

MASCO is a charitable corporation with 23 member and associate member organizations, established to plan, develop and enhance the LMA for the benefit of the public and its members. We offer a wide range of services including transportation planning and development, parking and transit and travel demand management through our TMA, CommuteWorks.

Thank you for your consideration.

Sincerely,



Tom Yardley, Senior Planner





# City of Medford

Office of The Mayor  
Rooms 202-204, City Hall  
Medford, Massachusetts 02155  
Telephone (781) 393-2408

MICHAEL J. MCGLYNN  
MAYOR

FAX (781) 393-2514  
TDD (781) 393-2516

Richard A. Davey  
Secretary of Transportation and MPO Chairman  
10 Park Plaza, Suite 3170  
Boston, MA 02116

September 13, 2100

Dear Secretary Davey:

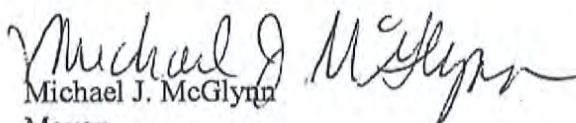
The City of Medford has reviewed the Boston Metropolitan Planning Organization's (MPO) Draft Long Range Transportation Plan –Paths to a Sustainable Region (LRTP) and the draft Transportation Improvement Program (TIP) for fiscal years 2012-2015 and would like to submit the following comments.

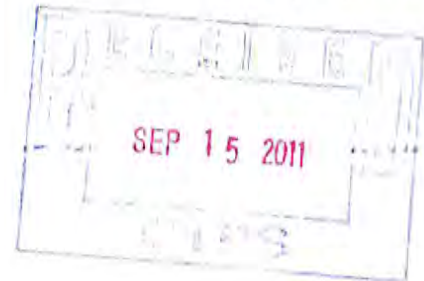
The Green Line Extension project has been documented for air quality, transportation and economic development benefits. Of these, the air quality benefits should be of overriding concern. The City is concerned that the Green line Extension Project has been underfunded and construction delayed as a result. In addition to the fact that legal commitments have not been fulfilled of more concern should be the fact that even additional and necessary, planning, design and engineering has failed to progress to the point of making this project "construction ready" in the event federal funding becomes available as part of an economic stimulus package.

The City respectfully requests that the MPO revise the LRTP and TIP to allocate the necessary funding for implementation the Green Line Extension Project in keeping with the State's current legal commitments and that the project be allocated sufficient funding for planning and design to make the project "shovel ready".

Thank you for your consideration of these comments.

Very truly yours,

  
Michael J. McGlynn  
Mayor



cc. Anne McGahan  
Regional Transportation Plan Coordinator  
10 park Plaza, suite 2150  
Boston, MA 02116

Sean Pfalzer  
Transportation Improvement Plan Coordinator  
Central Planning Transportation Planning Staff  
Certification Activities Group  
10 park Plaza, suite 2150  
Boston, MA 02116

Marc Draisen  
Executive Director  
Metropolitan Area Planning Council  
60 Temple Place  
Boston, MA 02111

September 13, 2011

David Mohler, Chair  
Transportation Planning and Programming Committee  
10 Park Plaza, Suite 2150  
Boston, MA 02116-3968

Dear Mr. Mohler:

The North Suburban Planning Council has reviewed the draft document (dated August 4, 2011) Long-Range Transportation Plan (LRTP), Paths to a Sustainable Region. We appreciate the opportunity to review this draft of the plan and offer the following comments.

The LRTP states that given the funding constraints, maintenance challenges, and capacity issues, there was consensus that no additional regionally significant projects should be selected in the new LRTP and that the LRTP should honor its previous project commitments. However, the LRTP further states that the MPO has decided to approve a slightly modified version of the "Current Approach" strategy that leaves approximately 42 percent of funds unassigned to fund less regionally significant projects through the Transportation Improvement Program (TIP). These apparent contradictory statements are a major concern of North Suburban Planning Council.

#### **Process Concerns**

In the working drafts of the plan the LRTP left approximately 26% of funds unassigned while continuing to honor its previous commitments compared to the 42 percent of the draft LRTP. The modified version of the "Current Approach" slows down previous commitments and makes the initial years of the plan unclear to communities and the State as to which projects are going forward. Many projects have been in the queue for years because of limited dollars and funding and communities have been investing money in design but in this approach uncertainty in the early years of the plan as to the projects that will go forward is not good planning.

The inclusion in the draft LRTP to modify the "Current Approach" was done without significant deliberation and consideration of the troubling impacts and uncertainty that is being proposed in allocating the funding available in the LRTP. If a change of this magnitude is to be considered then the development of the LRTP should be altered to include the projects being considered that have less regional significance. The public process should be transparent so that all will understand the priority and timing of future projects for the benefit of both the region and the communities. Communities, especially in these difficult financial times, need to have a transparent process so that decisions made at the local level of investing scarce resources in future transportation projects may be properly evaluated.

In addition, the new policy makes the first years of the LRTP less clear by pushing defined projects to later years. Most long range plans leave the outer years less defined giving the flexibility needed for the future but making the early years more defined so that design and development are more committed to higher degree of certainty.

### North Suburban Planning Council Projects of Importance

The following North Suburban Planning Council projects are detrimentally affected by the proposed policy:

- The I93/I95 Interchange (Reading, Stoneham, Wakefield, and Woburn)
- New Boston Street Bridge (Woburn)
- Montvale Ave. (Woburn)
- West Street (Reading)
- The Tri-Community Bikeway (Woburn, Stoneham and Winchester)
- Route 3 and Route 38 intersections (Woburn, Winchester)

While the I93/I95 Interchange project has regional significance, there are many other smaller scale projects that are equally if not more important for the subregion. This includes projects such as the Tri-Community Bikeway which would promote non-motorized transportation alternatives. All of these projects have now been pushed into the next decade. The North Suburban Planning Council asks that the MPO give further deliberation to the impacts that the slightly modified version of the "Current Approach" strategy will have and consider reinstating the so-called "Current Approach" strategy without modification at this time.

Sincerely,

**TONY FIELDS**

Tony Fields, Chairman  
North Suburban Planning Council

Cc: Eric Bourassa, Manager, Transportation Planning, MAPC



# Old Colony Planning Council



Robert G. Moran, Jr.  
President

70 School Street  
Brockton, MA 02301-4097

Pasquale Ciaramella  
Executive Director

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Website: [www.ocpcrpa.org](http://www.ocpcrpa.org)

September 12, 2011

David Mohler, Chairman  
Transportation Planning and Programming Committee  
10 Park Plaza, Suite 2150  
Boston, MA 02116

RE: Boston MPO Long Range Transportation Plan

Dear Chairman Mohler,

On behalf of the Old Colony Joint Transportation Committee (JTC), and the Old Colony Planning Council (OCPC), please accept this comment letter regarding the importance of transportation improvements to the Route 3 South Corridor and the opportunity for their inclusion in the Boston MPO's Long Range Transportation Plan.

The Route 3 South Corridor continues to be a major north-south corridor in Southeastern Massachusetts, and we believe that transportation improvements to the Route 3 South Corridor are a regional priority. Old Colony Planning Council conducted the original Route 3 South Corridor Planning Study in 1977 that identified the need for future capacity enhancement to accommodate regional growth and travel demand. Transportation improvements to the Route 3 South Corridor have thus been a regional priority at least 30 years. Specifically, the capacity enhancement of Route 3 to a six-lane cross section from Hingham to Route 44 in Plymouth continues to be a priority, as it has been for a number of years.

The Route 44 Relocation Project in Plymouth opened to traffic in 2005. The addition of this east west limited access facility from Route 3 in Plymouth to Route 58 in Plympton represents a major capital investment with traffic flow improvements in Kingston and Plymouth, with Route 3 between Exits 6 and 7 was widened to six lanes. The Route 44 Relocation Project combined with transportation induced growth, ongoing large-scale mixed use developments in Plymouth and Southfield, and beyond will have a major impact on existing bottlenecks and commuter traveling to and from metropolitan Boston via Route 3 South.

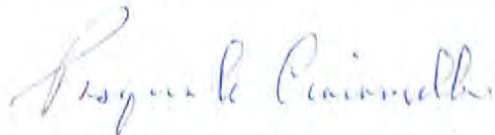
While we continue to support the transportation improvements to the Route 3 South Corridor, we are also mindful of the existing financial constraints and the need to adequately maintain the existing infrastructure. To that end, the Old Colony Metropolitan Planning Organization has documented the need for the Route 3 South Corridor transportation improvements in their

2012 Regional Transportation Plan, but has not included such improvements within the financially constrained listed of regionally significance projects.

As such, we ask that the Boston MPO consider identifying the importance of transportation improvements to the Route 3 South Corridor their Long Range Transportation Plan as well.

Thank you for your consideration of this request. Should you have any questions, please contact me at 508-583-1833 Extension 202.

Sincerely,



Pasquale Ciaramella  
Executive Director

CC:

Senate President Therese Murray

State Representative Thomas Calter

State Representative Vinny deMacedo

Dennis N. Randall, OCPC Delegate, Kingston

Lee Hartmann, Director, Plymouth Department of Planning & Development, and OCPC

Delegate, Plymouth



# REGIONAL TRANSPORTATION ADVISORY COUNCIL



September 13, 2011

David Mohler, Chair  
Transportation Planning and Programming Committee  
Boston Region Metropolitan Planning Organization  
State Transportation Building  
10 Park Plaza, Suite 4150  
Boston, MA 02116

RE: Draft Long-Range Transportation Plan, *Paths to a Sustainable Region*

Dear Mr. Mohler,

The Regional Transportation Advisory Council (Advisory Council) is an independent group of citizen and regional advocacy groups, municipal officials, and agencies charged by the Boston Region Metropolitan Planning Organization (MPO) with providing public input on transportation planning and programming. The Advisory Council has been involved in the development of the Long-Range Transportation Plan (LRTP) throughout the last two years. The Advisory Council's Plan Committee met to discuss the Plan on six occasions since March of 2010 and the outcomes of those meetings are the foundation of the comments that follow.

The Advisory Council supports projects and programs that will bring about a sustainable region envisioned by the LRTP. Decades of expansion have created a transportation system with such overwhelming maintenance needs that further expansion to support our economy and quality of life is nearly impossible without deferring critical maintenance. The region continues to depend heavily on automobiles despite compelling evidence of climate change and an uncertain future for fuel costs. Too many people continue to be hurt or die in preventable transportation accidents. More funding is needed for the regional transportation system and the current national financial crisis promises to exacerbate this problem, rather than help solve it. These problems call for change and we commend the MPO for recognizing these issues and studying them through the Needs Assessment conducted for the Long-Range Transportation Plan.

However, more can and needs to be done to address these problems. The MPO's policies that guide investments in the transportation system can go further to ensure the necessary change happens. Many of the policies are broad and in some instances contradictory. The Advisory Council recommends the following policy preferences that can help the MPO make the difficult, but necessary, tradeoffs that are unavoidable in transportation planning.

First, the Advisory Council agrees with the MPO that maintenance of the existing system must be the highest priority. Transportation is the circulatory system of our economy. Too much labor

*Providing transportation policy advice to the Boston Region Metropolitan Planning Organization*

State Transportation Building • Ten Park Plaza, Suite 2150 • Boston, Massachusetts 02116-3968  
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and funding has gone towards developing our existing system of roads, bridges, transit, ports, and paths to let it crumble as more attractive expansion projects are pursued.

However, the Advisory Council also recognizes that the region will continue to grow and more people will put further strain on the system. Judicious expansion will be necessary. When there is funding available for expansion, the MPO should favor rail, transit, bicycle, and pedestrian projects over highway projects. These are more sustainable modes for accommodating growth in the movement of people and goods. We are not opposed to highways, but support programs and projects to use the system more efficiently rather than simply adding lanes.

Additionally, the Advisory Council urges the MPO to use quantifiable performance measures to determine which projects are the best to fund. There are simply not enough funds to construct all of the projects that are proposed. In the absence of data-driven decisions, political considerations take precedence. The MPO should seek to quantify and qualify the costs relative to the benefits of each project. This work should take into consideration economic development, environment and greenhouse gas emissions reduction, public health, congestion, and safety costs and benefits among others.

A summary of the most important guidance we have for the MPO is:

- Maintenance of the existing system should be the highest priority. The MPO should set a percentage of funds to dedicate to maintenance and adhere to it, even when funding is reduced. We are concerned that only 42 percent of the highway funds at the MPO's discretion are left unassigned to projects in the LRTP. This means less money will be available each year in the Transportation Improvement Program to allocate towards maintenance, modernization, and operational efficiency projects all around the region.
- The Advisory Council encourages the MPO to prioritize transit, rail (passenger and freight), bicycle and pedestrian projects over highways for expansion of the system.
- Project selection should be primarily on the basis of statistical data and performance measures describing existing conditions. Project proposals should include predicted improvements. Subsequent to the project's completion, a final study should be conducted to ensure the anticipated benefits were realized and so that lessons learned can be applied to similar projects in the future. Before-and-after studies should also look at the larger transportation system to understand if unexpected benefits or problems developed as a result of the project. The MPO's TIP Before-and-After Evaluation study in the federal fiscal year 2012 Unified Planning Work Program is a good start and we will support more work of this nature in the future.
- The MPO should include illustrative projects in the Long-Range Transportation Plan so that it can express a more compelling vision of the future to the public and Legislature. Among the projects that could produce such a compelling vision are the Urban Ring, the Blue Line Extension to Lynn, the Red Line-Blue Line Connector, the North-South Rail Link, and electrification of the commuter rail system.

In addition, the Advisory Council also has several suggestions specific to the various modes and freight distribution. They are summarized below.

### **Transit**

Transit will continue to play a key role in the region's transportation mix, especially given the anticipated aging of the population and the limits to highway expansion. We have the following suggestions for transit in *Paths to a Sustainable Region*.

- The Advisory Council supports the MPO's decision to flex highway funds to transit, as it has done for Phase II of the Green Line Extension. This allows the MBTA to focus all of the federal transit funds coming into the region on maintenance.
- We are concerned about the deferral of the entire Green Line Extension project and if more funding would expedite the project, we would like the MPO to consider flexing highway funds to construct it. We urge MassDOT, the MBTA, Somerville, and Medford to work together to get the project back on track.
- Closing gaps in the existing network should be a priority when adding to the system.
- Emerging plans for high-speed rail in the Northeast must be taken into consideration in highway and transit project development so as to facilitate the envisioned improvements. The MPO should actively support infrastructure improvements that would allow the speeds needed for true high-speed rail.

### **Freight**

The Advisory Council has long been a proponent for better freight planning in the Boston region. Our economy and quality of life are directly impacted by the ease with which freight moves. Eastern Massachusetts is heavily dependent on trucks, which has detrimental effects on the condition and safety of our roads and the prices of the goods we need. We have the following suggestions for freight in *Paths to a Sustainable Region*.

- The LRTP should include a chapter dedicated to freight movement.
- The freight benefits and drawbacks of each project in the LRTP should be identified and then discussed in the project description.
- Investments in freight rail infrastructure, whether shared with passengers or exclusively for freight, should be supported when they will result in significant public benefits derived from the diversion of freight from trucks to rail.
- Four expansion projects recommended by the Advisory Council's Freight Committee would offer substantial benefits to freight distribution in the region. These are the Conley Terminal Bypass Road and extension and rehabilitation of Track 61 in South Boston, improvements to the CSX rail line between Framingham and Mansfield, and a truck stop along Interstate 495 between Westford and Interstate 90 with electric plug-ins and other modern features. We appreciate the MPO's inclusion of the Conley Terminal Bypass Road in the LRTP.

### **Highways**

While the Advisory Council favors the expansion of other modes over highways, we recognize the importance of the current roadway network. We urge the MPO to support and study ways in



which the existing system can be managed for increased efficiencies that will improve safety and reduce congestion and fuel consumption. We have the following suggestions for highways in *Paths to a Sustainable Region*.

- The Advisory Council supports a high-occupancy vehicle lane system and other tools that will improve the efficiency of the region's highways, and provide incentives for carpooling. We look forward to reviewing the MPO's HOV study that is now underway.
- Some of the major interchange projects are largely modernization projects and should be identified as such.

### **Pedestrian and Bicycle**

The MPO strongly supports the expansion of healthy transportation options, especially in light of the emerging threats from climate change and obesity. A tremendous expansion of this infrastructure could be achieved simply by using space on our existing roadways better. Shared-use paths are a more expensive but effective way to also support healthy transportation. However, the Advisory Council urges the MPO to develop a stronger set of criteria for evaluating shared-use paths. We have the following suggestions for bicycle and pedestrian investments in *Paths to a Sustainable Region*.

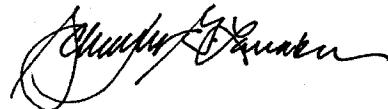
- Invest in roadway projects only if they support the needs of all street users.
- Establish criteria for the evaluation of shared-use paths so that projects that will receive the most use and do the most to remove automobiles from streets are given priority. We offer the following suggestions for criteria considerations:
  - Number of transit users that will use the path to access a transit station
  - Number and size of activity centers connected by the path
  - Number of cars removed from the roads
  - Will the path be lighted?
  - Will the path be cleared of snow?
  - Level of community support
  - Economic and social impacts of the path

In conclusion, the Advisory Council commends the MPO for the difficult work and decisions that went into developing *Paths to a Sustainable Region*. While we have offered some overarching guidance for the future, we realize your work is difficult and there are many stakeholders involved. We also recognize the severe fiscal constraint under which the LRTP was developed. We look forward to working with you on the next plan and are prepared to support the difficult choices necessary to move us towards a more sustainable future.

Sincerely,



Laura Wiener, Advisory Council Chair



Schuyler Larrabee, Plan Committee Chair



Massachusetts Chapter

September 1, 2011

Mr. David Mohler, Chair  
Transportation Planning and Programming Committee  
Boston Region Metropolitan Planning Organization  
10 Park Plaza, Suite 2150  
Boston, MA 02116-3968

Re: "Paths to a Sustainable Region" –  
Proposed changes to State Implementation Plan (SIP)

Dear Mr. Mohler:

The Massachusetts Chapter of the Sierra Club firmly believes that the purpose of enlightened and responsible transportation policy is to discourage use of the private automobile by encouraging the development and utilization of more benign alternatives: Streets must be designed to be pedestrian-friendly. The scattered bicycle paths in and around Boston must be expanded and integrated into a coherent system. And most importantly, the frequency and coverage of our public transportation should be greatly increased. Further, we support the concept of "environmental justice" in broadening the coverage of public transportation among populations that are lower income and more transit-dependent, in both our urban areas and in rural regions of the Commonwealth.

Thus we are very concerned by recent proposals by MassDOT and the Metropolitan Planning Organization to delay or abolish several of its commitments as outlined in the State Implementation Plan. Once again, it seems that the needs of the inner city population—the MBTA's "captive audience," so to speak—are being slighted in the rush to lure suburban commuters back onto public transportation. It is instructive to note that those SIP commitments that have been completed to date, particularly commuter rail extensions and park & ride lots, largely benefit the latter population. (In the case of the Greenbush line, cost was no object in designing the project to ameliorate the concerns of the abutting communities.) But when it comes to projects that would benefit those of us who live in the congested urban core, once again we end up with the short end of the stick.

The residents of Somerville and Medford have long demanded an extension of the Green Line into their communities that would provide them with a seamless, one-seat ride into downtown Boston. Only after incessant pressure from citizens and elected officials did state transportation officials finally agree several years ago to honor this longstanding commitment. But now as the planning process has continued to develop, the project's expected opening date keeps receding, and in a manner that leaves people to wonder if it will ever be fully completed: Last year it was pushed back a year to 2015, with the final mile to Mystic Valley Parkway delayed a year or two beyond that date. Several months ago the MPO proposed abandoning that last link altogether, retreating only under public outrage. Now we are told that the bulk of the extension would not open until 2018, with Mystic Valley pushed back two more years after that. Such repeated delays are intolerable, showing a profound and inexcusable disrespect to residents who want, and deserve, a first class public transit system. The litany of broken promises must end and the construction commence without any further delay.



Massachusetts Chapter

We are also appalled by the state's proposal to abandon the design process for the Red Line/Blue Line Connector that would extend the Blue Line under Cambridge Street to Charles station, finally providing a direct transfer between these two transit lines. This gap is a missing link in our transit system, and its completion would be of great benefit to the passengers who regularly travel these two transit lines, as well as to riders on the other lines who use the downtown transfer stations. For those who regularly depend upon the Red Line or the Blue Line, the benefits are most obvious; however, the benefits for other subway riders are equally important in relieving pressure on the downtown transfer stations that are now overtaxed with airport travelers and other passengers going one stop just to transfer between the two lines. The Connector is not a frill but a badly needed addition to the T system. It is instructive to note that while the Commonwealth expands transit and commuter rail lines in all directions away from the center, it has systematically neglected any expansion to its downtown core—and that the MPO does not even bother to list any proposed remediation for failing to meet its deadline for designing the project. This imbalance of priorities must stop! It urgently behooves MassDOT to continue the planning for this link against the day that the money becomes available for its construction.

In closing, we must also note with regret delay in the completion of the Fairmount Line Improvement Project, largely due to controversy over the siting of the Blue Hill Avenue station. We are encouraged, however, that construction is proceeding on the remaining three stations yet to be completed, and we trust that rail service shall commence at these locations even before Blue Hill is finally opened. Like the people along the new Green Line and those who would be served by the Red/Blue Connector, the residents of North Dorchester and Mattapan deserve no less than first class public transportation.

Respectfully submitted,

John Kyper, Transportation Chair  
Sierra Club, Massachusetts Chapter

cc: Kate Fichter, MassDOT  
Jerome Grafe, MassDEP



2 Alpine Street, P.O. Box 440343  
Somerville, MA 02144  
617-776-4100  
[www.somervillechamber.org](http://www.somervillechamber.org)

September 13, 2011

David Mohler, Chair, Transportation Planning and Programming Committee  
Massachusetts Department of Transportation (MassDOT)  
10 Park Plaza, Suite 2150  
Boston, MA 02111

**RE: Boston MPO 2012-2015 TIP; Boston MPO LRTP; SIP Transit Commitments**

Dear Chairman Mohler:

Can the MBTA build out a mile of the Green Line Extension (GLX) on time and on budget? The transit authority in Dallas, Texas recently completed a 28 mile, light rail Green Line on time and under budget.

Economic development comes with new transit service. The MassDOT Board of Directors, itself, "unanimously endorsed this project not only as a transportation project but as an economic development project." From the NorthPoint area in East Cambridge, the very next stations would be in Somerville's GLX development zone. This zone is comprised of four contiguous business districts – Innerbelt, Brickbottom, Union Square, and Boynton Yards. This zone is as close to the Green Line's Government Station as the Prudential Center and is larger than the Longwood Medical Area.

Located in the most densely populated city in New England and in the Brainpower Triangle of the MIT, Harvard, and Tufts communities, this zone is ideally situated for a 21<sup>st</sup> Century workforce. The City, this local chamber and international planners and consultants have found that the GLX would help unlock the area for millions of square feet of office and R&D development; thousands of jobs; and thousands of housing units – all in an urban, mixed-use, transit-oriented development.

As such development unfolds, one of this Commonwealth's most dependent cities – where the municipal budget is the lowest per capita, while the MBTA is the largest property owner – would become more self sufficient and fiscally sustainable. This major city in the urban core would be less and less dependent on annual state aid.

There is arguably no other mile in New England where a transit authority holds clearer title to the right of way, where a metropolitan area could build smarter infrastructure and where transit oriented investment could sooner take off. This region could use the construction jobs and the permanent jobs. We hope Governor Patrick, MassDOT and the MBTA can come together to make it happen.

Sincerely,

A handwritten signature in black ink, appearing to read "Stephen V. Mackey", is written over a light blue horizontal line.

Stephen V. Mackey  
President/CEO





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

David Mohler, Chair  
MPO Transportation Planning and Programming Committee  
10 Park Plaza Suite 2150  
Boston, MA 02116

September 12, 2011

Dear Mr. Mohler:

We are writing to offer our comments on the Long Range Transportation Plan and specifically the proposed delay in completion of the Green Line Extension to Somerville and Medford. The Green Line Extension is an extremely high priority for all of us as well as for the state for environmental, legal and economic reasons. Delaying this project will delay all of these benefits and add an additional \$200 million to the cost of the project. Therefore, we have serious concerns about this delay and we would ask that the MPO reject the proposed time frame of 2018-2020.

The proposed delay is inconsistent with everything that we have been told by DOT for the past several years. Additionally, the proposed delay violates the commonwealth's legal requirement to give highest priority in all transportation planning documents to those projects the state has promised to complete in order to become compliant with the federal Clean Air Act. The Green Line Extension not only is one of those projects, but it is the one the state says will provide by far the greatest air quality benefits.

The current proposal is to begin land acquisition once DOT has received a Finding of No Significant Impact and then to wait until all land acquisitions have been completed before beginning any construction. This is scheduled to take two years. This is an unnecessary delay. There are very few major parcels to be acquired throughout the entire corridor and most should be acquired fairly quickly. Given a proposed 55 month construction schedule, there is no reason that work cannot be done building the Green Line Extension while the details are worked out on a land taking that is only needed for the maintenance facility. Construction of the maintenance facility could easily be scheduled for the final stages of the project allowing ample time for land acquisition. Adopting this scheduling change could reduce the project time frame by as much as 2 years.

DOT should revisit this schedule and to offer solutions that will speed up completion including beginning construction before land acquisitions are complete and by offering new phased construction schedules that will allow portions of the line to be opened prior to the completion of the entire line. DOT should be required to set multiple schedule deadlines so that progress toward those goals can be monitored. It would not be unreasonable to expect that DOT could complete preliminary design (the current HDR contract) by the end of 2012, advertise Design-Build contract in the first quarter of 2013 and have Green

Line service operational from the new Lechmere station to Washington Street by end of 2015 with full service operational to Medford by 2016.

Pursuant to the SIP, this latest delay, even if the time frame is shortened to 2016, will require DOT to take on additional Clean Air Act commitments. These additional commitments must directly benefit those who have already been waiting on the Green Line for years. In particular, DOT's mitigation efforts should focus on full build of the original project to Route 16 and completion of the Community Path.

We understand that building the Green Line Extension is an expensive proposition; however, it is a legal commitment of the commonwealth as a result of the Big Dig. It is no less of a commitment than the state's commitment to pay the contractors and the bond holders for the construction of the Big Dig itself. DOT and the state must find a way to pay for this commitment and for the financing of the state's transportation infrastructure generally including the necessary capital and operating expenses of the Green Line Extension and an assessment of all feasible financial actions to bring the TIP into compliance and conformity with Federal Requirements by the end of 2011.

Sincerely,



Patricia D. Jehlen  
State Senator



Sal N. DiDomenico  
State Senator



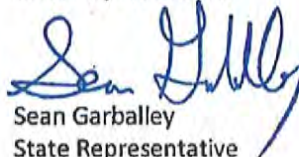
Denise Provost  
State Representative



Timothy J. Toomey  
State Representative



Carl M. Sciortino  
State Representative



Sean Garballey  
State Representative





PO Box One, Somerville MA 02143

September 13, 2011

Kate Fichter, Mass DOT Office of Transportation Planning  
Jerome Grafe, Mass DEP Bureau of Waste Prevention

Dear Ms. Fichter and Mr. Grafe,

Union Square Main Streets (USMS) welcomes this opportunity to comment on the Boston Region MPO draft Long Range Transportation Plan (LRTP) and draft 2012 – 2015 Transportation Improvement Plan (TIP). USMS is a non-profit community organization whose mission is to improve the commercial viability of Union Square. We consider the timely completion of the Green Line Extension (GLX) to Medford and Union Square, Somerville, essential to achieving our goals. We are concerned and disappointed by the GLX project's slow pace and ever-mounting delays.

USMS asks the DEP to reject the delayed GLX project schedule contained in the 2011 SIP Transit Commitments Annual Status Report. Additionally, the MPO should not accept the draft LRTP and SIP since they do not satisfy Transportation Conformity Regulations.

#### **Low priority given to SIP transit commitments**

Massachusetts' long-standing nonattainment status with regard to ozone has required several Transportation Control Measures (TCMs) to be contained within the State Implementation Plan (SIP). Of these TCMs, the GLX is the largest unfinished project and when complete will provide most significant air quality benefits. Despite its central importance to air quality, it is clear that the GLX project will not be complete by December 2014. The GLX project cost (without the section from College Avenue to Route 16/ Mystic Valley Parkway) is estimated at \$1120 million in the LRTP. For FY 2012 through 2015, GLX funding amounts to \$476 million in the TIP, and \$560 million in the LRTP.

Since less than half of the GLX project cost is programmed through FY 2015, the TIP does not meet the Transportation Conformity Rules requirement that "all State and local agencies with influence over approvals or funding for TCMs are giving maximum priority to approval or funding of TCMs over other projects within their control." Although Mass DOT will presumably petition the Department of Environmental Protection (DEP) to delay the GLX project, it apparently has not done so. Lacking approval

by DEP of such a petition to delay, the current deadlines for TCMs in the SIP should be used to determine the lack of conformity.

While the GLX is underfunded by over 50%, other projects are being pushed forward and funded in direct violation of the requirement that delayed TCMs in the SIP must be given the highest priority in the LRTP and TIP. The Route 128 add-a-lane megaproject, for example, if deferred could supply funding needed by the GLX.

#### **No credible financing for the GLX**

Metropolitan planning statutes require the LRTP and TIP to include a financial plan that "indicates resources from public and private sources that are reasonably expected to be available to carry out the program," and accordingly the Transportation Conformity Rules state that a conformity determination can only be made on a fiscally constrained LRTP and TIP. The state's 2008 transportation bond bill authorizes up to \$700 million for the SIP transit commitments, of which \$600 million could be allocated for the GLX project. However a provision of the bill states that "any federal grants received by the commonwealth or the Massachusetts Bay Transportation Authority for the Green Line to Medford Hillside and Union Square spur project shall be applied to reduce the state authorization by that amount." Using the LRTP's assumptions that the GLX project will cost \$1120 million, and \$560 million (50%) New Start funding will be obtained, the bonding authority would be reduced to \$40 million (\$600 million - \$560 million), leaving a \$520 million shortfall. Additional bonding authority is clearly needed even if 50% New Starts funding is awarded. Without this bonding authority, or another source of funding, the GLX project cannot be financed. Therefore the LRTP and TIP are not fiscally constrained and should not be judged to be conforming.

#### **Negative economic consequences of delay**

In May 2011 Mass DOT estimated the GLX project cost at \$934 million, but now, as a result of the delay until 2018 - 2020, the estimate is 20% higher, or \$1120 million. Because of the delay, from January 1, 2015, until the GLX is in full operation, Mass DOT must provide an interim offset project with air quality benefits equal to at least 110% of the GLX within the GLX cities and towns. Since no specific projects have yet been proposed, it is difficult to estimate cost, but it is hard to imagine a replacement project that can be completed in just over 2 years and that would cost significantly less than the GLX itself. Over a period of 4 to 6 years, it is easily possible that its cost could amount to hundreds of millions of dollars.

The greatest costs to the Commonwealth are likely to be due to postponement of the economic benefits from the GLX. According to the 2011 Draft Needs Assessment (volume 2 of the LRTP), the GLX project would have economic benefits important not only locally, but also at the regional and state scale: "Rezoning and redevelopment of the Inner Belt, Brickbottom, Boynton Yards and Union Square areas along the Green Line extension have the potential to add more than 5 million square feet of retail, office, and residential space, with 1,300 new housing units and up to 9,500 new jobs." Close proximity of these development areas to MIT, Harvard and Tufts would make them very attractive for the innovative businesses spawned by these major research universities if better access was provide by the GLX.



The latest delay is particularly frustrating in light of substantial public and private investments in the Union Square area that have been predicated upon the opening of a Green Line station in 2014. Over the past few years the City of Somerville has created a master plan for Union Square, Boynton Yards and adjacent areas, and a similar effort is now underway for the Inner Belt district. Somerville has adopted new zoning ordinances, with participation by USMS, which promote transit-oriented development in the Union Square area, encouraging greater density closest to the proposed Union Square station. Major infrastructure improvements have been made along Somerville Avenue, and more are planned in the Union Square area to support future development.

### **Conclusion**

It is simply unacceptable that 30 years after the Commonwealth committed to build the Green Line Extension that so little has been achieved: on a cost basis less than 5% of the project has been completed; current sources of funding are inadequate; and completion is now claimed to be farther off than when the SIP commitments were revised in 2007. It would be a mistake to reward the wavering and dilatory pursuit of this project with yet another extension, particularly in view of the blatant non-conformity of the LRTP and SIP with regard to missed project deadlines, inappropriate TCM priorities and lack of fiscal constraint.

USMS therefore asks the DEP to reject the delayed GLX project schedule contained in the 2011 SIP Transit Commitments Annual Status Report. Additionally, the MPO should not accept the draft LRTP and SIP since they do not satisfy Transportation Conformity Regulations.

Signed,

Mimi Graney, Executive Director

Livingston Parsons III, President, Board of Directors



# City of Waltham

*Jeannette A. McCarthy*  
Mayor

September 13, 2011

David J. Mohler, Chair  
Transportation Planning & Programming Committee  
Boston Region Metropolitan Planning Organization  
State Transportation Building  
Ten Park Plaza, Suite 2150  
Boston, MA 02116-3968

Sent by US Mail and  
fax to 617-973-8855

RE: Request for Targeted Transportation Improvement Project  
Long-Range Transportation Plan – Boston Region MPO

Dear Mr. Mohler:

On behalf of the City of Waltham, I would like to thank you for the invitation to provide comments on the Boston MPO's Long Range Transportation Plan (LRTP). This letter follows a separate letter sent to your office on August 9, 2001, in which I requested that the Boston MPO allocate funding for transportation studies along critical corridors (Routes 20 and 117) in the City of Waltham.

It is my understanding that DOT, utilizing \$150K to be paid by the developer of the former Polaroid site, is going to send out Request for Proposals to study a multi-modal center off Route 128 in the vicinity of Routes 20/117.

As part of your long-range transportation plan, I respectfully request that you program the need for a new interchange and system of frontage roads, including Green Street, between Routes 20, 117, and 128 as an important transportation infrastructure project that will:

- improve congestion, air quality, and circulation
- remove existing traffic from the Stow Street neighborhood
- accommodate multi-modal users seeking to access a potential transit station, and
- encourage economic development in the area.

I understand there are several flexible options for interchange configurations and new or relocated ramps that will require extensive data collection, analysis, and state and federal permitting. Although interchange concepts have been proposed by developers in the past, I hope that the Boston MPO and other state agencies will advance a regional-scale improvement that protects the residential neighborhoods east of Route 128. I understand that SPC Main Street LLC, a nearby developer, recently acquired several properties between Green Street and Route 128 to facilitate future regional transportation needs. It may be possible to advance an early-action project to widen and improve Green Street as an important local and regional connector between Routes 117 and 20. MassDOT conceptually approved a plan for this work in the past; it will be considerably less than what may ultimately be required for a full interchange improvement.

Preliminary endorsement of a regional transportation improvement project will allow the City, MAPC, MassDOT, MBTA, other agencies and private parties to effectively plan and conceptually design improvements and advance critical permitting. Thank you for your consideration as you finalize this important work plan.

Sincerely,

Jeannette A. McCarthy  
JAM/ns



# City of Woburn Massachusetts

City Hall  
10 Common Street  
Woburn, MA 01801

Tel: 781-897-5901  
[www.cityofwoburn.com](http://www.cityofwoburn.com)

**Scott D. Galvin**  
*Mayor*

September 9, 2011

David Mohler, Chair  
Transportation Planning and Programming Committee  
10 Park Plaza, Suite 2150  
Boston, MA 02116

Subject: Woburn comments on the draft Long-Range Transportation Plan (LRTP), Paths to a Sustainable Region document (dated August 4, 2011)

Dear Chairman Mohler:

The City of Woburn has reviewed the draft document (dated August 4, 2011) Long-Range Transportation Plan (LRTP), Paths to a Sustainable Region and wishes to provide the following comments for the Boston MPO's consideration.

The New Boston Street Bridge and Montvale Avenue projects have been moved into the next decade in this draft of the LRTP and the City of Woburn is requesting a rethinking of these projects for earlier inclusion in the LRTP. The New Boston Street Bridge, the City's top priority, had been included in the Journey to 2030 – Transportation Plan of the Boston Region Metropolitan Planning Organization for construction in 2016-2020 and Woburn has actually asked, in TIP discussions, that both projects be moved to an earlier timeframe.

In Woburn's review of the LRTP, it states that given the funding constraints, maintenance challenges, and capacity issues, there was consensus that no additional regionally significant projects should be selected in the new LRTP and that the LRTP should honor its previous project commitments. However, the LRTP further states that the MPO has decided to approve a slightly modified version of the "Current Approach" strategy that leaves approximately 42 percent of LRTP funds unassigned to fund less regionally significant projects through the Transportation Improvement Program (TIP). It is this policy change that Woburn believes has negatively affected its two projects.

In the working drafts of the plan the LRTP left approximately 26% of LRTP funds unassigned, while continuing to honor its previous commitments, compared to the 42 percent of the draft LRTP. The modified version of the "Current Approach" which slows down previous commitments and makes the initial years of the plan unclear to communities and the State as to which projects are going forward. The Woburn projects were negatively affected by this decision because both were programmed for 2016-2020 in the working draft.

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Long-Range Transportation Plan  
September 9, 2011

These projects have been stuck in the queue for years because of limited dollars and funding, we understand that limitation. However, Woburn has been investing money in design with certain expectations and to have a policy change push these projects further into the future is unacceptable.

The inclusion in the draft LRTP of a modified "Current Approach" was done without significant deliberation and consideration of the troubling impacts and uncertainty that is being proposed in allocating the funding available in the LRTP. More significant is why it is being done to include projects that have less regional significance. The public process should be transparent so that all will understand the priority and timing of future projects for the benefit of both the region and the communities like Woburn. Communities, especially in these difficult financial times, need to have a transparent process so that decisions made at the local level by those who are investing scarce resources understand which future transportation projects will be funded and when.

In addition, Woburn is concerned that the new policy makes the first years of the LRTP less clear by pushing defined projects to later years. Most long range plans leave the outer years less defined giving the flexibility needed for the future but making the early years more defined so that design and development are more committed to higher degree of certainty. We believe that this new approach is not good long term planning and leads to uncertainty as to which projects will go forward and when.

The City of Woburn requests that the MPO give further deliberation to the impacts of the slightly modified version of the "Current Approach" strategy and reinstate the so-called "Current Approach" strategy without modification and move forward the New Boston Street Bridge and Montvale Avenue into this decade.

Thank you for the opportunity to provide input into the draft Long-Range Transportation Plan (LRTP), Paths to a Sustainable Region document (dated August 4, 2011). Woburn looks forward to working with the MPO in continuing to move transportation projects forward in the region. Please feel free to contact my office at anytime if additional information is needed.

Sincerely,



Scott D. Galvin,  
Mayor

Cc: Eric Bourassa, Transportation Manager, MAPC  
Paul Regan, Executive Director, MBTA Advisory Board



# Kenneth J. Krause

50 Mystic Street Medford, MA 02155  
781-396-0920 kenneth.krause@comcast.net

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September 13, 2011

David Mohler, Chair  
Transportation Planning and Programming Committee  
Boston Metropolitan Planning Organization  
10 Park Plaza, Suite 2150  
Boston, MA 02116-3968

Dear Mr. Mohler,

Thank you for the opportunity to comment on the Boston Region Metropolitan Planning Organization's draft Long Range Transportation Plan (LRTP) and draft Transportation Improvement Program (TIP) for federal fiscal years 2012-15.

I am pleased that the MPO is focusing on creating "Paths to a Sustainable Region" and that the LRTP has added "climate change" and "livability" as two new areas of emphasis.

With those criteria in mind, I feel it is most appropriate for the Boston MPO to accord the four remaining State Implementation Plan (SIP) transit commitment projects maximum priority in the LRTP, with the Green Line Extension (GLX) to Somerville and Medford atop the list.

The GLX is projected to provide an estimated 80% of the air quality improvements that the Commonwealth is required to attain from the remaining SIP projects in order to become compliant with the federal Clean Air Act. In addition, it will provide the frequent, reliable, safe and clean transit service that is sorely lacking in the Green Line Extension corridor today.

While I am pleased that the LRTP and TIP designate funding for the Green Line Extension, I recommend the following revisions before it is approved:

- The LRTP allocates \$586.6 million for the GLX in FFY2012-15, yet the TIP only allocates \$475.7 million for the same period. The TIP amount should be increased to equal the amount in the LRTP so the needed funds are available to advance the project in a timely fashion.
- MassDOT recently re-stated the projected completion date for Phase I of the GLX – to College Avenue in Medford and Union Square in Somerville – to sometime between September 2018 and July 2020. The LRTP currently allocates \$533.3 million for Phase I of the GLX in the 2016-20 period, but it also allocates \$1.85 million for Phase II of the GLX – from the temporary terminus at College Avenue to Mystic Valley Parkway at the Medford-Somerville boundary – in 2016-20. Given that these two phases of the project have melded into one on the MassDOT calendar, the LRTP should combine the two separate 2016-20 allocations for the GLX into one that funds the second half of the work in Phase I and all of Phase 2. This would also, once and for all, assure that the Commonwealth fulfills its legal obligation to extend the Green Line to Medford Hillside, which a terminus station at College Avenue does not.

The LRTP allocations for the other three SIP transit commitment projects also should be adjusted. Not only are these projects emblematic of the goals set forth in the LRTP, but as Transportation Control Measures in the SIP, they must be accorded full funding in all state transportation planning documents in order for these plans to gain federal approval. Therefore, the LRTP and TIP should be revised to allocate the funding amounts required to complete the Red Line-Blue Line connector design (\$49 million), the Fairmount commuter rail line improvements (\$54.1 million) and the addition of 1,000 park-and-ride parking spaces in the MBTA system (\$32 million).

I would also like to record my support for two other long overdue Medford projects in the LRTP's Recommended Plan – reconstruction of the Revere Beach Parkway bridge over the Malden River (\$41 million, 2012-15) and reconstruction of the Cradock Bridge (Main Street) over the Mystic River (\$11.6 million, 2012-15). These projects will help improve user safety for all modes (autos, bicycles and pedestrians) and also benefit the waterways the bridges span, especially the Mystic River. The latter project will remove the century-old and defunct Cradock Bridge locks, eliminating the existing water flow constrictions and decreasing the risk of flooding in Medford and Somerville after heavy rains.

Thank you for the opportunity to comment on these plans. I look forward not only their approval on Sept. 22, but more importantly, to the speedy delivery of the projects contained therein, in particular the over-delayed and over-due Green Line Extension to Somerville and Medford.

Sincerely,

*Ken Krause*

Ken Krause  
50 Mystic St.  
Medford, MA 02155

James McGinnis  
26 Bow Street  
Somerville, MA 02143

September 13, 2011

Kate Fichter, MassDOT, Office of Transportation Planning  
Jerome Grafe, Mass DEP, Bureau of Waste Prevention

Dear Ms. Fichter and Mr. Grafe,

I am writing to comment on the Boston Region Metropolitan Planning Organization's (MPO) draft Long Range Transportation Plan (LRTP) and draft 2012 to 2015 State Implementation Plan (SIP), and MassDOT's "State Implementation Plan – Transit Commitments 2011 Status Report". My particular concern is the proposed delay in completing the Green Line Extension (GLX) project until 2018 – 2020, several years past the SIP deadline of December 31, 2014. Although my understanding is that MassDOT has not formally requested a revision of the SIP with a later deadline, the above three documents generally incorporate this date. (An important exception to this is that air quality improvements from the GLX still assume it will be completed in 2014.)

As the largest Transportation Control Measure (TCM) required by the SIP (310 CMR 7.36), completion of the GLX is a legal obligation of the Commonwealth under the Clean Air Act (CAA). As such Transportation Conformity Regulations require the Boston MPO to give SIP TCMs the highest priority for funding and project completion. The LRTP and TIP must conform to the goals of the SIP, and no project may receive federal review, approval or funding with a finding by the federal Department of Transportation conformance with the SIP.

The GLX project's postponed completion to 2018 – 2020 in the LRTP and TIP and its lack of sufficient funding clearly do not conform to the SIP. Although Mass DOT has not yet petitioned the Department of Environmental Protection (DEP) to delay the GLX project as required by 310 CMR 7.36(4)(c), the funding proposed in the LRTP and TIP for FY 2012 – FY 2015, \$586,654,000 and \$476,200,000 respectively, is less than 50% of the project's estimated cost of \$1,120,000,000. This funding schedule appears to correspond to the unapproved project delay.

If DEP and the MPO do not produce a LRTP and TIP that conform to the SIP, it is possible that the US Department of Transportation (USDOT) will not certify the state Transportation Improvement Plan (STIP). This would repeat the situation that occurred in December, 2007, when USDOT did not approve the STIP due to similar problems. The previous TIP would then remain in effect, so no new projects could be initiated, and when those projects were completed, eventually all federal transportation funding to the state could be cut off.

Although previously accepted by the MPO and the DEP, the possibly indefinite postponement of the section of the GLX between College Avenue and Route 16/Mystic Valley Parkway is yet another way in which these plans fail to meet the SIP requirements. The problem is that College Avenue is *not* Medford Hillside, the main branch terminus named in the SIP. Abundant research into the current and historic meaning of "Medford Hillside" does not support Mass DOT's contention that College Avenue is, or ever was, part of this district; and in fact it arguably it is not even on Medford Hillside's eastern boundary.

As a person who has followed the progress of the GLX since the Beyond Lechmere Major Investment Study, the announcement of yet another major "unavoidable" delay is all too familiar. Since the current SIP was adopted in 2007, the GLX project has continually missed important milestones. There was even a

period of 8 to 10 months when, as far as I could tell, nothing was being done to advance the project; apparently staff were working on other projects like the aborted 28X RT scheme. However, now we must acknowledge how little has been achieved in the last 4 years - but I hope you will not encourage or tolerate this kind of dismal performance in the future.

Many of the stated reasons for the latest delay could and should have been anticipated much earlier. For example, the need to avoid commuter rail service interruptions during construction was known from the start of this project, but somehow only recently taken into account in the schedule. The failure of the GLX project team last fall to prepare for competitive bidding on the extension of the design contract also put the project back several months.

One of the most commonly cited causes of delay is the 2 years needed to acquire land and relocate any businesses thereby displaced. The actual land taking only requires determining property ownership, assessing its value, and then title may be taken and a *pro tanto* payment made. According to experts this requires 6 to 12 months at most. The only land acquisitions that displace businesses are for the Ball Square and Union Square stations, and for the maintenance facility. Relocating a business could certainly take longer than 12 months, but none of the properties where businesses will be displaced are needed for the early construction phases, and thus are not on the critical path. The largest property acquisitions, and the largest displaced business, are for the maintenance facility, which significantly is not mandated by the SIP.

The purpose of our national air quality standards, and the Transportation Conformity Regulations, is to protect public health, and residents of Somerville are uniquely motivated to see these rules enforced. Somerville is heavily burdened by regional transportation with highways carrying over 250,000 vehicles per day including I-93, Route 38 and Route 28. In addition 8 train lines pass through Somerville without stopping, including over 200 commuter rail trains per day. The Boston Engine Terminal in Somerville services the entire MBCR system, and is a major source of airborne pollution. Current public health research indicates inner core pollution levels like those in Somerville produce sharply higher overall mortality rates, increasing lung cancer and heart attack mortality by as much as 50%. Somerville is literally dying to see the GLX finished.

The lack of transparency and candor throughout this project is disappointing. Through May 2011 monthly SIP status reports stated that the GLX would only be 10 months late, until in July 2011, an added 3 to 5 year slippage was revealed. Although there has been vigorous public participation in many aspects of this project, it has been coupled with enthusiastic support and a spirit of cooperation. It would be wonderful if the MPO and DEP could restore the public's trust in process by holding the GLX project to a schedule as close as possible to the end of 2014.

Signed,  
James McGinnis



Jeff Reese Comments regarding GLX delays

Ms. Kate Fichter  
MassDOT, Office of Transportation Planning  
Room 4150, Ten Park Plaza  
Boston, MA 02116  
[Katherine.fichter@dot.state.ma.us](mailto:Katherine.fichter@dot.state.ma.us)

Mr. Jerome Grafe  
MassDEP, Bureau of Waste Prevention  
Boston, MA 02018  
[jerome.grafe@state.ma.us](mailto:jerome.grafe@state.ma.us)

Ms. Christine Kirby, Mass Department of Environmental Protection,  
[christine.kirby@state.ma.us](mailto:christine.kirby@state.ma.us)

Mr. David Mohler, Chair, Boston MPO Planning & Programming Committee,  
[David.mohler@state.ma.us](mailto:David.mohler@state.ma.us)

Boston MPO Staff at [publicinformation@ctps.org](mailto:publicinformation@ctps.org)

**RE:** The "SIP transit commitments," the "Boston MPO 2012-2015 TIP" and the "Boston MPO LRTP."

To whom it may concern:

I am writing to express my shock, dismay, disgust, anger, disappointment... you name a negative emotion and I'm feeling it, regarding the recent announcement that the MBTA green line extension ("GLX") into Somerville, MA and Medford, MA is AGAIN being FURTHER delayed. Now you are saying completion may be later than 2020??? This is unacceptable. The GLX is a MANDATORY project. The state agreed to it as a part of the Big Dig, and the state's obligation to complete the GLX was confirmed in a Conservation Law Foundation lawsuit, which I believe was in the year 2000. Originally this project was to be completed by 2011. Then it was delayed, with no interim offset projects that I'm aware of, until 2014. Then I believe it was delayed until 2015. Now you are saying there is a low probability of it even being completed by 2018??? OUTRAGEOUS!!! This is unacceptable. The timeline needs to be restored to 2014 completion by any and all means. This project should be FAST-TRACKED. The state has been NEGLIGENT in its duties to complete this project. Any interim projects should address both environmental improvement AND transportation improvement, and at this stage of neglect, economic improvement as well. If the project is going to be late (technically it will be late at the end of 2011) then I want a rapid transit bus that stops only at each proposed GLX station area, at green line trolley intervals/frequency, that will take me directly to north station until the green line is operational. I also think Somerville and Medford should be exempted from state taxes during the period that the state is late with the GLX due to the economic loss caused by the delay. I am extremely angry.

## Jeff Reese Comments regarding GLX delays

I believe the MPO's draft TIP and LRTP should be REJECTED until they show 100% of the GLX's \$1 billion funding provided through 2015, with much of that money provided in 2011-12 for GLX property purchases and GLX bridge rebuilding.

### **TABLE OF CONTENTS FOR MY DETAILED COMMENTS**

*Note: "GLX" is the abbreviation I use for "Green Line Extension".*

1. The reasons given for the GLX delays are lies.
2. The GLX should be the state's top priority, but the state is, other than some lip service, not acting like it is even a high priority, much less the top priority.
3. Personal impacts of the delay for me
4. Impact of the delays on Somerville and Medford
5. Consequences of the delays to you (the Commonwealth of Massachusetts, Mass DOT, MPO, MBTA, etc.)
- APPENDIX: Importance of the GLX project
  - o Somerville & Medford have been neglected, are woefully underserved while simultaneously overburdened.
    - Environmental & Health
    - Transportation/mobility
    - Economic

### **DETAILED COMMENTS**

1. **The recent reasons given for the newest delays are absolutely PHONY, FICTITIOUS LIES.** I do not believe them for a second. You are stalling for more funding or more years to spread the funding out over.
  - 1.1. Reason #1 you gave for the delay: A cost/schedule/risk analysis performed in March that provided "a much deeper and more nuanced understanding of the constraints and limitations that must be managed in order to implement the Green Line project":
    - 1.1.1. I have been a structural engineer for 13 years. Although I don't work on transportation projects, I am familiar with the construction and design industries. There is no "nuance", "limitation", or "challenge" that would have been so badly overlooked or underestimated during schematic planning and design that would have resulted in a 6 year delay, tripling the schedule, during design development. Are you telling me that you had a bunch of 5<sup>th</sup> graders doing the schematic planning phase for you???
    - 1.1.2. Using Greenbush Line land acquisition delays as a lesson learned for the GLX is not a valid comparison because the land required was for right of way. This is not the case for the GLX. GLX land acquisition is for station locations and the maintenance facility (not included in the SIP agreement)
  - 1.2. Reason #2 you gave for the delay: "Complexities of FTA New Starts funding"
    - 1.2.1. Irrelevant. You are to proceed with or without New Starts funding. Obtaining federal funding is not a requirement for this project to proceed. Talk to the FTA. Talk to President Obama, he's a Democrat, so he'll be reasonable about getting mass transit projects built. Persuade New Starts to let you proceed with the project while applying for New Starts

## Jeff Reese Comments regarding GLX delays

- simultaneously and get expenditures made pre-New-Starts-award funded retroactively. If that doesn't work, fully funding the project on your own NOW will allow you to continue on schedule even if your New Starts application fails.
- 1.2.2. From what I've heard, getting New Starts funding for this project is unlikely anyway. Why are you wasting project schedule pursuing it so aggressively that it dictates the schedule and causes 6 year delays???
  - 1.3. The most likely reason I see for the delay is an attempt to spread out funding over more time and delay to get more funding. A lot of non-GLX supporters whine that the MBTA is already broke, so it shouldn't spend money on the GLX. Problems I see with that argument include:
    - 1.3.1. The MBTA was saddled with Big Dig debt by the state when "Forward Funding" was instituted, so at least half of its debt is the state dumping its obligations on the MBTA. See the April 2009 report "Born Broke: How the MBTA found itself with too much debt..." by the MBTA Advisory Board. If this debt is putting the GLX project at risk, then the state should re-assume the debt and the Forward Funding legislation should be repealed.
    - 1.3.2. Mass transit projects are better than highway projects. Mass transit projects create long term jobs (much needed at this point in time, wouldn't you say?), are better for the environment, charge user fees and thus are less heavily subsidized than highway projects
      - 1.3.2.1. According to the organization Transportation for America, "Only 18 cents of every transportation dollar supports public transportation."
2. **The GLX should be the state's highest priority.** Refer to my appendix on the need for the GLX for additional reasons why this project should be priority #1. It is a LEGAL obligation.
- 2.1. The state is not treating the GLX as the highest priority, nor even a high priority, other than lip service.
    - 2.1.1. Highway expansion projects sneaking into the TIP, stealing money from the GLX. For example, in the Wellesley area, route 128 is being expanded from 3 lanes per direction to 4. How is this project even close to being as necessary as the GLX??? The highway capacity might not be what users want there, but at least they already HAVE a highway with 3 lanes per direction that they could have used just fine without that project... we on the other hand have ZERO green line trolleys to ride. You want to convince me that the state is serious about its commitment to the GLX, then **SHOW ME THE MONEY!!! CEASE ALL LESS-IMPORTANT HIGHWAY EXPANSION OR IMPROVEMENT PROJECTS IN THE TIP UNTIL THE GLX IS COMPLETED. Only repair and maintenance... even those I wouldn't mind seeing some highways shut down due to disrepair until the GLX funding is fully accounted for. Flex ALL money in the TIP to the GLX.**

Jeff Reese Comments regarding GLX delays

- 2.1.2. Not fully funding the GLX in the TIP: Through 2015, less than 50% of the projected \$1 billion GLX cost is funded in the proposed TIP (and most of that money comes at the end of the 2011-2015 period). This is unacceptable. You need to fund the GLX as if it will meet its 2014 deadline, otherwise it will never make the deadline. This project needs to be completed on schedule, without New Starts funding if need be. Again, **SHOW ME THE MONEY!**
  - 2.1.2.1. You need to purchase properties (taken by eminent domain), **DO IT NOW!!! FUND THIS NOW!!!**
  - 2.1.2.2. You need to rebuild bridges to make them longer for the trolleys to fit below. **DO IT NOW!!! FUND THIS NOW!!!**
  - 2.1.2.3. You need utility companies to move utility lines. **MAKE THEM DO THIS NOW!!!** If they drag their heels, take the sections of utilities that need moving by eminent domain and move them yourselves. **MOVE THEM NOW!!! FUND IT NOW!!!**
- 2.1.3. 20+ years of delays, more recently delayed 2011 to 2014, then 2014 to 2015, now 2015 to possibly not even completion by 2020. There is a history of the state dragging its heels on this project. It is time to make up for years of neglect and abuse. **MAKE THIS HAPPEN ON TIME!**
- 2.1.4. Find creative solutions to solve schedule problems.
  - 2.1.4.1. Hire multiple contractors to work on different areas simultaneously.
  - 2.1.4.2. For now, scale back on station complexity. Build foundations that will work for the ideal station designs, but start off the first few years with stations that, like Science Park or Charles/MGH, or Lechmere, are just a blockade of turn-styles to get in, followed by stairs and an elevator to get to an uncovered platform. I don't care if I have to wait in the rain or snow the first few years, just so long as I have an actual trolley to wait for!

**3. Personal impacts of the delay for me:**

- 3.1. At a recent MPO TIP meeting, employees leading the meeting said that most GLX riders would be merely changing from riding the bus to the GLX and new ridership wouldn't go up much for the MBTA. I rarely take the bus and I have to drive just about everywhere. The bus is slow, it gets caught in the same traffic jams as everyone else, it stops frequently while riding it, arrives infrequently when waiting for it, and it isn't as environmentally friendly or efficient as a subway. The GLX would motivate me to use my car less. I would be someone who would change from auto to MBTA. I don't appreciate leaders of the MPO talking about the GLX like it is some insignificant little project. It is a **HUGE** deal to Somerville and Medford.
- 3.2. Some examples for you:
  - 3.2.1. Recently I had to go to the Cambridgeside Galleria Mall. There was a store there that was the only place I could go to get what I needed. Had the GLX been completed, I could have walked a couple of blocks, taken the



## Jeff Reese Comments regarding GLX delays

Green Line to Lechemere, walked a couple more blocks, and been there in no time. Without the Green Line, my best method of transportation was to drive there in my car.

- 3.2.2. I work in Salem, MA. If the GLX were completed, I could walk a couple of blocks, take the Green Line to North Station, then a commuter rail to work. As it is now, I have to take a bus, which is unreliable and slow because of it's infrequent schedule, frequent stops, and road traffic jams that a bus can't avoid, to a subway, to a commuter rail. The GLX could cut at least 30 minutes off of each 1-way commute. Imagine what I could do with an extra hour each day! As it is now, commutes to work via public transportation can take as long as 2 hours, each way, if I'm unlucky making connections between types of vehicles. That excludes missing trains due to the bus being late. As it is now, driving my car (sometimes even in gridlock traffic) is a better option for me. The GLX would likely convert me to public transportation. There will also likely be a lot of people using the Community Bike Path to bike from more northern cities to get to the Green Line, which would be new riders too, given that the GLX and bike path projects go hand-in-hand.
- 3.2.3. I like to buy groceries at Whole Foods. If the GLX were in operation to Route 16 in Medford, riding the Green Line to get groceries would be my best option. As it is now, my best option is to drive to Cambridge.

### **4. Impact on Somerville and Medford:**

- 4.1. Continued poor environment, health, mobility, and economic prospects.
- 4.2. We have Magoun and Ball Squares primed and ready for the type of success that occurred in Davis Square when the Red Line stop arrived, but lack of parking means only high quality public transportation will ignite these squares economically. Every day the GLX project is delayed robs these squares of income.
- 4.3. Boloco Restaurant in Medford recently announced that they are closing, specifically because of the delays in the GLX. They were depending on GLX to increase customers.
- 4.4. See the Appendix for additional impacts and further detail.

### **5. Consequences to you (the state, Mass DOT, MPO, MBTA, etc.):**

- 5.1. The shame of the majority of the most densely populated region in New England, a mere 3 miles from the heart of Boston, not having ANY metro service. (See Appendix for additional detail)
- 5.2. Losing FTA funding for EVERYTHING in the state because GLX delays broke your legal obligations.
- 5.3. Another lawsuit, which I will be actively encouraging.
- 5.4. Paying for Interim offset project. What can you possibly give us as interim offset projects that would match the environmental benefits of the GLX, as you would be legally required to provide??? How much extra are those offsets going to cost??? How will you pay for them??? It would be cheaper just to get

## Jeff Reese Comments regarding GLX delays

the GLX project done ON TIME!!! Even if you have to spend more money than you are currently projecting, in order to get multiple contractors working simultaneously with extra coordination among contractors.

- 5.5. Increased construction costs as costs always rise with time, making the GLX project more expensive the more you delay.
- 5.6. Angry constituents. I will vote in elections for whichever candidate takes the GLX project the most seriously and will work hardest to complete it ON TIME. I am a single issue voter. I will vote Republican for the first time in my life if a Republican candidate shows more dedication to this project.

### Appendix *(signature line is after appendix)*

- I'll reiterate, the GLX is needed. It is needed for:
  - o Environmental/Health reasons: I93 cuts through Medford and Somerville dumping large quantities of pollutants and carcinogens into these two towns. The GLX is green technology that will reduce local traffic, helping reduce some of those pollutant and carcinogen levels. The cities of Somerville and Medford bear a heavy burden that the rest of the state enjoys tremendous benefit from. Extending the green line into these two cities should be PRIORITY NUMBER ONE, and should not be delayed. The GLX and Big Dig were supposed to go hand-in-hand. If the GLX is delayed, then maybe it's time to consider restricting traffic volume on I93 to reduce the negative environmental and health effects on Somerville and Medford.
  - o Transportation reasons: The T subway and trolley system has HUGE gaps in service coverage in this region. No other region that is in this 2 mile to 5 mile range of distance from the center of Boston is so poorly served. Quincy, which is much further from Boston center, has tremendously better subway/trolley service than Somerville and Medford. Because this area is so densely populated and developed, not having adequate transit forces residents to use cars, and that large of a population in that small of a geographical area means gridlock on the roads. Transit is the only way out of the gridlock. Getting to work for me should not take 2 hours via walking, then a slow bus that gets stuck in traffic, then a subway, then a commuter rail (which the slow bus might have made me miss), then walking. I've been on many subway/metro systems across the United States and Europe, and they all make the MBTA's coverage and service SHAMEFUL.
  - o Economic reasons: because such a densely populated area (Somerville is the most densely populated city in all of Massachusetts) is FORCED to use cars due to piss poor MBTA service coverage, the economy suffers. It is impossible to provide ample road service and parking in such a densely populated and developed area. Transit is the only hope for improved economics. It is also unfair to residents who are low income and cannot afford to own and operate a car.

- The state of Massachusetts benefits tremendously from the many passenger rails, freight rails, and highways (including interstate 93, which will see more traffic due to the Big Dig) that go through Somerville and Medford, yet Somerville and Medford bear a heavy burden for Massachusetts's with little to no benefits. Somerville and Medford have been COMPLETELY NEGLECTED when it comes to transit and environmental protection

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## **SOMERVILLE AND MEDFORD ARE NEGLECTED WHEN IT COMES TO TRANSIT AND ENVIRONMENTAL PROTECTION:**

WHAT'S WRONG WITH THIS PICTURE?:

**Mapquest.com driving distances to cities from Boston combined with number of T-subway stops:**

Boston to Somerville (the most densely populated city in MA): **3.32 miles** with **1** T-subway stop (Davis Square) at the perimeter of the city that actually serves VERY little of Somerville.

Boston to Brookline: **4.61 miles** with more than **17** T-subway stops (per the Brookline city transit web page: "The C Line travels through Brookline along Beacon Street from Cleveland Circle to St. Mary's Street with 12 stops along the way. The D Line travels through the Town from the Reservoir Station near Cleveland Circle to Chapel Street in the Longwood Medical area. There are five stations or stops for Brookline residents on the D Line. Although not located in Brookline, the B Line of the Green Line is also accessible to residents living in North Brookline.")

Boston to South Medford (where I live): **4.65 miles**: nearest subway stop is 1.37 miles away (Davis Square)

Boston to Medford: **6.00 miles** with **1** T-subway stop (Wellington) at the perimeter of the city that actually serves VERY little of Medford.

Boston to Malden: **6.47 miles** with **two** T-subway stops (Malden and Oak Grove)

Boston to Quincy: **9.51 miles** with **four** T-subway stops (North Quincy, Wollaston, Quincy Center, Quincy Adams)



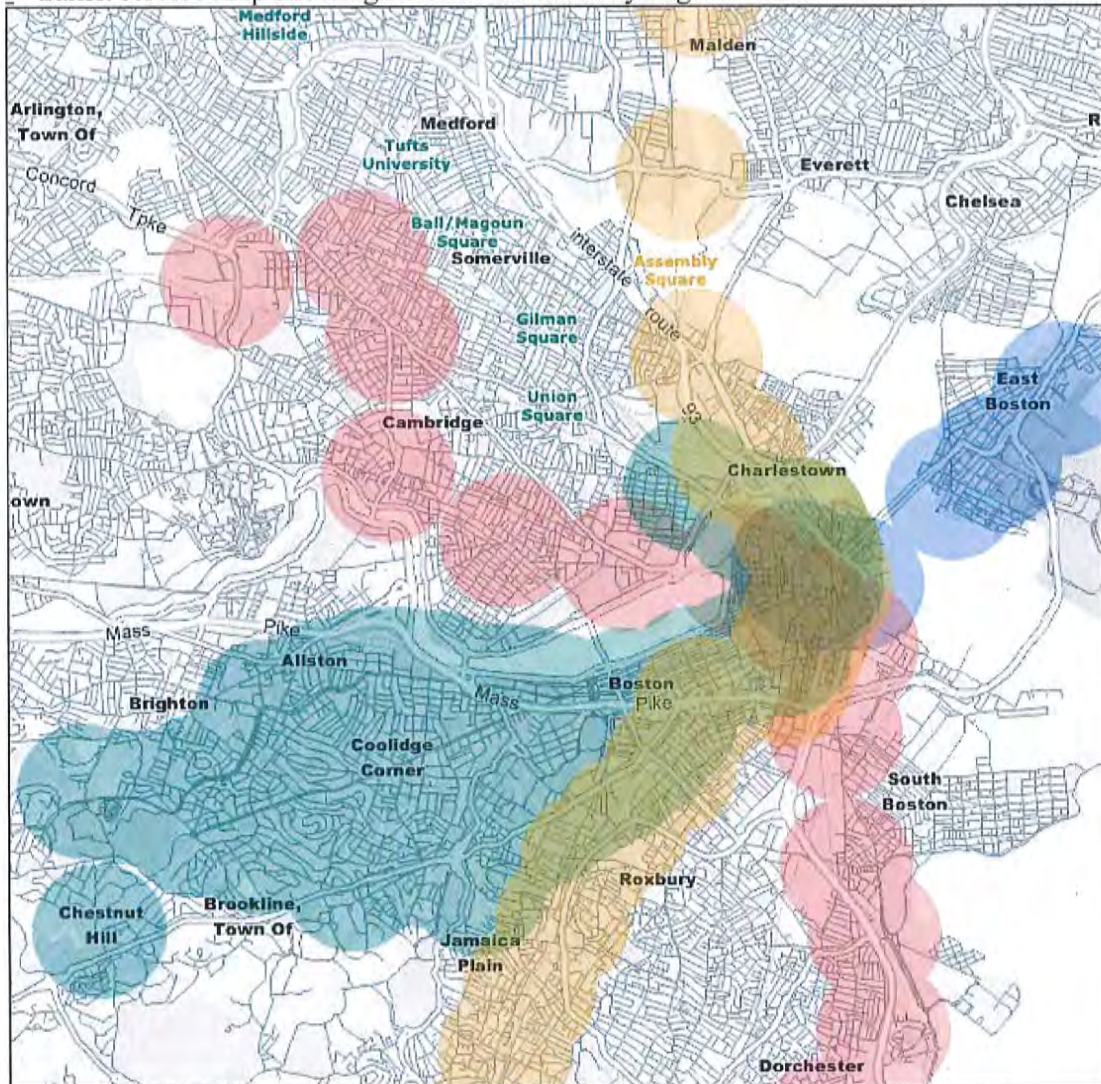
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from the Somerville Transportation Equity Partnership website:

**Eight passenger train lines pass through Somerville. Only one of them stops.**

**We carry many burdens of the region's transportation and deserve a greater share of the benefits.**

transit service map showing how transit currently neglects Somerville and Medford:



Studies show that the 12 miles from Swampscott to North Station can be covered in 26 minutes by commuter rail, while it can take 30 minutes to make the 2.5-mile commute by bus and subway from Union Square to North Station. Somerville's residents are the second most reliant on public transit to get to and from work, but we have only one T stop. And yet, we pay about as much to the MBTA as Newton does, which is well served

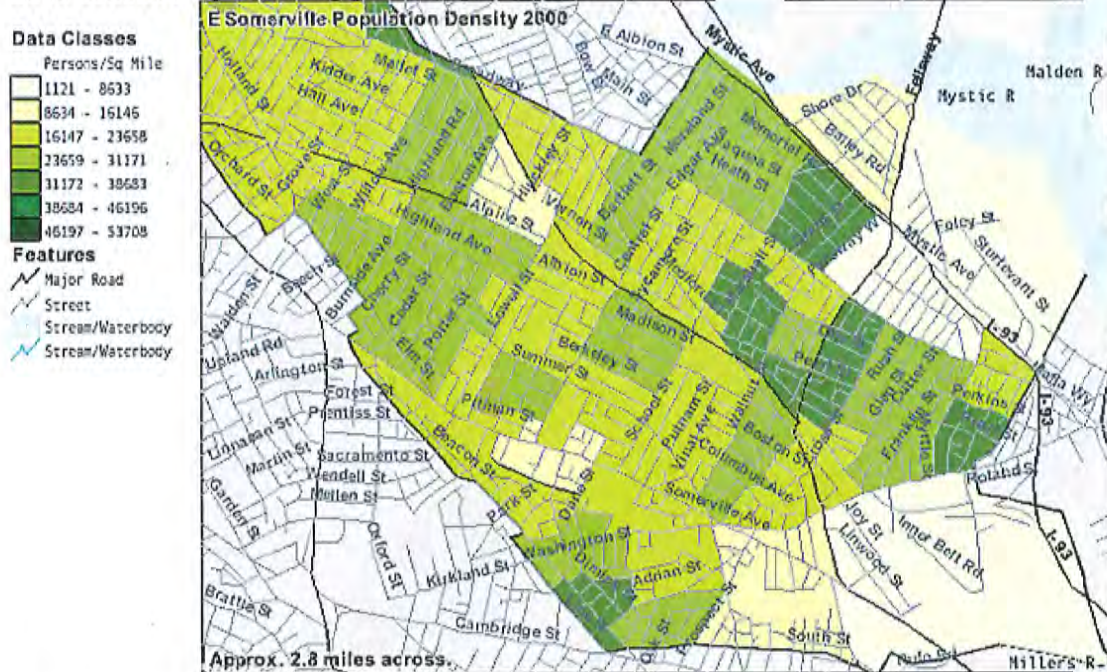


by the Green Line, a commuter rail line with three stops, and an express bus service to downtown Boston. Is this fair?

**Somerville is the densest city in New England, and the sixth densest city in the U.S.**

**Tens of thousands of us live within walking distance of potential T stops.**

**2000 census map showing persons per square mile:**



Over one quarter of Somerville households have no cars. We have nearly 6,000 immigrants per square mile (second highest after Chelsea). Environmental justice policies require that transportation benefits and burdens be shared fairly, with special protection extended to neighborhoods like East Somerville that have high concentrations of immigrants and of moderate and low-income residents. But instead we are poorly served by public transit. Is this fair?

**Somerville has the most excess lung cancer and heart attack deaths per square mile of any of Massachusetts' 350 cities and towns.**

**Our health is in danger because of the pollution brought by excess traffic.**

As a whole, our city has the second greatest exposure to pollution and the least open space in Massachusetts. And the Route 28 Corridor is facing a doubling of traffic, if nothing is done, from today's 50,000 vehicle trips per day. Bringing transit to Somerville is the largest unfunded Clean Air Act obligation for our state when it comes to transportation dollars. Is this fair? ([Read more about Health and Environmental Justice.](#))

**Massachusetts is legally obligated to extend the Green Line by 2011.**

**We must work together to hold the state to its commitments.**



To offset the environmental impacts of the Big Dig, the state agreed to extend the Green Line. This obligation falls under the Clean Air Act and appears in two places: The Ozone State Implementation Plan between the state and the EPA, and the Administrative Consent Order overseen by the state's Department of Environmental Protection. But it's becoming clear that the state intends to break its promise. Is this fair? ([Read more about Massachusetts agencies.](#))

**The T stop revitalized Davis Square and can revitalize other parts of Somerville.**

**Better transportation means stronger businesses, more jobs, and faster commutes.** Train service can help businesses grow and bring critical tax dollars to the city to pay for needed services. Davis Square thrived after the Red Line extension provided access to good public transportation. The same thing can happen in Union Square and other locations in Somerville. Expanded T service is a crucial component of the city's future economic viability. Somerville used to have eight passenger train stops. Now that sounds fair!

- 
- The Green Line extension still has not been fully funded as previously promised.
  - Federal regulations require it to be a strong priority in state and MPO plans, but it is not.

**Background Information**

1. In Somerville, the densest city in the Northeast, we are exposed to dangerous vehicle pollution from traffic on I93 and Route 28, and 200 diesel commuter rail trains that pass through every day. State public health records show many excess deaths in Somerville from lung cancer and heart attack compared to Massachusetts averages even though our residents smoke less.
2. Somerville is an "environmental justice" community with a very high density of minority, low-income, non-English speaking residents. Many in Somerville do not have cars and are completely dependent on public transit. Buses stuck in traffic and the lack of clean, convenient transit stink.
3. Since 1990 the state has been legally obligated to extend the Green Line through Somerville to Medford to partially offset the dangerous levels of pollution from the Big Dig (I-93). Service was supposed to begin in 2011. The Green Line extensions will improve our air quality and service.
4. In November 2006, to settle a lawsuit over the lack of progress, the state committed to fully fund the project but delayed its completion to 2014. Since then it has not provided the necessary resources to meet the schedule and there has been too little progress.

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**from the city of Somerville's webpage (circa 2007):**  
**Green Line Extension Info**

**THE PROJECT**

- The MBTA is evaluating alternatives for extending transit service to Somerville

**THE NEED**

- Somerville grew prior to the automobile age as a streetcar suburb with narrow streets, little off-street parking, and better transit service than today
- This historic development has created the most densely populated community in New England
- Our roadway system is at capacity and bears large regional traffic volumes
- Existing traffic produces high levels of mobile source air pollution
- Most residents are required to take slow moving, unreliable buses operating on congested streets requiring a transfer to transit stations
- The City suffers from the unbalanced tax base and needs economic development to provide better city services, support capital investment, and operate a sustainable budget

**THE BURDEN**

- Somerville bears more burden than benefits from existing transportation infrastructure and service
- A large portion of Somerville includes environmental justice population areas designated by the State based on factors related to household income and minority populations
- Eight passenger rail lines pass through Somerville and only one stops
- The city is home to the 46-acre (tax-free) MBTA Commuter Rail Facility that has major environmental impacts on the East Somerville and Ward 2 neighborhoods
- The City bears the regional roadway infrastructure of I-93, Route 28, and many major arterials that carrying large volumes of the regional traffic
- The City currently pays an annual assessment of \$4.5 million to the MBTA

**THE COMMITMENT**

- The extension of the Green Line to Ball Square/Tufts University is a legal commitment in the State Implementation Plan (SIP) to meet federal air quality regulations
- The extension of the Green Line to Ball Square/Tufts University is a transit mitigation project in the Administrative Consent Order (ACO) from the Big Dig
- Both commitments require the project to be constructed and operating by December 31, 2011

**THE BENEFITS**

Better transit means frequent, fast, direct, and reliable transit service

**Better Transit will:**

- Improve community health, environment, and quality of life
- Create better access to employment, cultural and education opportunities
- Increase off-road transportation system capacity and improved connections to Boston and the region will assist our commercial districts to reach their full potential, create economic development, and facilitate future growth
- Reduce Vehicle Miles Traveled and promote alternative travel modes
- Provide opportunities to fulfill regional development demand from Cambridge and Boston
- Only with transit improvements can the City facilitate the concentrated development that promotes smart and sustainable growth for the region
- Reconnect Somerville's urban fabric to the inner core, **COMPLETING THE HUB**

- 
- **The state is trying to back away from its promise to fund 100% of the extensions.**
  - **The project is late now and may be delayed by two more years to look for Federal funds.**
  - **The state's application to US EPA to change the transit commitment deadline from 2011 to 2014 has not been honest about the project status. The Green Line project is at risk.**
- 

From Friends of the Community Path (circa 2011):

## LEGAL

The Green Line Extension has never been given top priority, even though the State is legally mandated to do so.

The Green Line extension has been the state's single largest Transportation Control Measure (TCM) obligation under the State Implementation Plan (SIP) for air quality for twenty years. Thus, it is a binding legal obligation under the Clean Air Act. Federal Transportation Conformity Regulations require that SIP TCMs like the Green Line Extension must be given funding and completion priority by the region and state.

The original legal agreement in 1990 to extend the Green Line was revised in 2000 for planned completion in 2011. Then it was delayed to 2014 in revisions to the State Implementation Plan (SIP), legal obligations under the Clean Air Act. Then last year MassDOT said the Green Line Extension (GLX) would not open until 2015. Now, they have announced even more delays, to 2018 to 2020!

Meeting this legal obligation requires the Boston MPO to show realistic funding sources and timely completion of the Green Line Extension in both the 2012 – 2015 Transportation Improvement Program (TIP) and the Long Range Transportation Plan (LRTP). Currently the TIP shows less than 50% of the money and less than 50% of the Green Line Extension being completed by the legal deadline of 2014. The state must pursue full bond funding of GLX to satisfy Federal Transportation Conformity.

The Draft 2012 – 2015 TIP and the Draft LRTP "Paths to a Sustainable Region" fail to meet both the "fiscal constraint" requirement for full funding and the "environmental" requirement for timely completion of the SIP TCMs. And, beyond the binding legal obligations, MassDOT and the Commonwealth have failed over and over again to meet promised deadlines given to the Green Line Extension communities



## **IMPACT OF GLX DELAY ON HEALTH**

The Green Line Extension is supposed to mitigate the health effects of vehicle pollution from I-93 and regional highway traffic as well as regional ozone. Delaying completion of the project without mitigation of the pollution will continue to negatively affect the health of Somerville and regional residents.

Somerville has the greatest daily exposure to commuter traffic and diesel rail pollution in the state from 250,000 vehicles on I-93, Mystic Avenue (38) and McGrath Highway (28). We also breathe fumes from 200 daily diesel commuter and freight trains that cut through the city but (fortunately) do not stop.

People who live in the most transportation-polluted 10% of a large urban region may have:

- 20% higher overall mortality rates
- 50% higher lung cancer mortalities
- 50% higher childhood asthma rates
- 50% higher heart attack mortalities

The Green Line is desperately needed, especially in environmental justice neighborhood of East Somerville and the economic justice neighborhood of East Cambridge.

## **SUSTAINABILITY**

The Green Line Extension is a great, sustainable transportation project.

It is no wonder the Green Line is overwhelmingly supported in Somerville and surrounding communities.

The Green Line delay would stall the Community Path extension. Once built, the Community Path will provide convenient access to Green Line stations and will connect the Charles River and Minuteman Path Networks.

The GLX is light rail that will provides clean transit to the city most health-burdened by highway and diesel commuter rail pollution.

85% of Somerville residents will have access to rail and many of our neighbors in East Cambridge, Medford and Arlington will have access to new light rail.

The Green Line Extension fully embodies the principles espoused by MassDOT's GreenDOT initiative:

*<http://transportation.blog.state.ma.us/blog/2010/06/massdot-launches-greenbot.html>*

## Jeff Reese Comments regarding GLX delays

*“GreenDOT, a comprehensive environmental responsibility and sustainability initiative that will make MassDOT a national leader in “greening” the state transportation system. GreenDOT will be driven by three primary goals: reduce greenhouse gas (GHG) emissions; promote the healthy transportation options of walking, bicycling, and public transit; and support for smart growth development.”*

### **IMPACT OF DELAY ON REGIONAL/STATEWIDE ECONOMICS**

The GLX delay could jeopardize the State’s federal transportation funding - a loss of \$650 million per year. The delay would also:

- Significantly increase the cost of the GLX project and needlessly cost taxpayers statewide \$200 million or more, plus the costs of required air quality mitigation to offset the delay.
- Deny a key regional transit link for employers, universities, research centers and residents.
- Result in significant loss of sales and income tax revenues to the Commonwealth because it misses the opportunity to create construction and other jobs when we really need them.
- Cause us to miss the benefits seen by other regions in the country such as Salt Lake City, Utah and Dallas, Texas that have recently built light rail on time and sometimes under budget.

### **FUNDING, TIMING and TRANSPARENCY**

Governor Patrick committed to build the Green Line Extension during his term in office. Governor Patrick and the Lieutenant Governor must honor this commitment.

The Green Line Extension communities have repeatedly welcomed project staff from MassDOT, the MBTA and their consultants. Cooperation, rapport and enthusiasm have generally been high on both sides whenever people have rolled up their sleeves to tackle project details. However, MassDOT has not been transparent at major steps with regard to securing real funding for the project and making reasonable time commitments.

MA DOT states that securing federal “New Starts” funding for the Green Line is risky because of the MBTA financial condition, but MA DOT has not demonstrated it has a funding plan and design and construction schedule to meet the SIP requirements using only state funding – which has been agreed to by the Commonwealth in the SIP agreement.

Monthly SIP reports as late as May 2011, committed to completing the Green Line Extension at the end of 2015, provide no suggestion of further possible delays. This reflects a lack of transparency and seriousness in meeting the legal SIP requirements.

## Jeff Reese Comments regarding GLX delays

MassDOT's assertion that land acquisition is a primary factor in the latest delay is not acceptable. Commuter rail track could be moved and track could be laid while waiting to acquire land for the Ball Square and Union Square Stations. Using Greenbush Line land acquisition delays as a lesson learned for the GLX is not a valid comparison because the land required was for right of way. This is not the case for the GLX. GLX land acquisition is for station locations and the maintenance facility (not included in the SIP agreement)

The suggested phasing scenario proposed for constructing the GLX should only be permitted if the State is legally bound to complete of the full GLX to Route 16 by 2018.

Why is GLX not being moved as aggressively as the Fast14 Bridge replacement project? With all the brain power of our region, why can't we get a 7-station transit extension built in a timely, cost-effective way? We have just recently built a massive new highway bridge on the Cape and we are widening our highways with a multi-year Route 128 mega-project, but we just can't seem to get a shovel in the ground on time for a sustainable urban light rail project.

---

### **From Somerville Transportation Equity Partnership circa 2011:**

- *MA DOT states that securing federal "New Starts" funding for the Green Line is risky because of the MBTA financial condition, but MA DOT has not demonstrated it has a funding plan and design and construction schedule to meet the SIP requirements using only state funding - which has been agreed to by the Commonwealth in the SIP agreement.*
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The Green Line Extension is supposed to mitigate the health effects of vehicle pollution from I-93 and regional highway traffic as well as regional ozone. Delaying completion of the project without mitigation of the pollution will continue to negatively affect the health of Somerville and regional residents. Somerville has the greatest daily exposure to

## Jeff Reese Comments regarding GLX delays

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### **IMPACT OF DELAY ON REGIONAL/STATEWIDE ECONOMICS:**

- Could jeopardize the State's federal transportation funding, a loss of \$650 million per year.
- Would significantly increase the cost of the GLX project and needlessly cost taxpayers statewide \$200 million or more, plus the costs of required air quality mitigation to offset the delay.
- Will deny a key regional transit link for employers, universities, research centers and residents.
- Will result in significant loss of sales and income tax revenues to the Commonwealth because it misses the opportunity to create construction and other jobs when we really need them.
- Will cause us to miss the benefits seen by other regions in the country such as Salt Lake City, Utah and Dallas, Texas that have recently built light rail on time and sometimes under budget.

### **IMPACT OF DELAY ON THE COMMUNITY PATH**

- Delaying GLX also delays the Community Path. The 2.3 mile Community Path extension will connect the regional Minuteman Path network to Boston and to the Charles River network.

### **TRANSPARENCY/CREDIBILITY:**

- Governor Patrick committed to build the Green Line Extension during his term in office.
- Governor Patrick and the Lieutenant Governor must honor this commitment.
- The Green Line Extension was legally mandated in 1990. Thirty years is an unacceptable delay.
- The Green Line Extension has never been given top priority, even though it is a legally obligated Transportation Control Measure specified in the State Implementation Plan (SIP).
- The state must pursue full bond funding of GLX to satisfy Federal Transportation Conformity.  
Why is GLX not being moved as aggressively as the Fast14 Bridge replacement



Jeff Reese Comments regarding GLX delays

project? With all the supposed brain power of our region, why can't we get a 7 station transit extension built in a timely, cost-effective way? We have just recently built a massive new highway bridge on the Cape and we are widening our highways with a multi-year Route 128 mega-project, but we just can't seem to get a shovel in the ground on time for a sustainable urban light rail project.

*\*GreenDOT*

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(END OF APPENDIX)

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Sincerely,  
Jeff Reese  
Current resident of Medford, MA  
former resident of Somerville, MA

Cc:

- Governor Deval Patrick and Lt. Governor Murray  
Office of the Governor  
Office of the Lt. Governor  
Room 280  
Boston, MA 02133
- Ms. Anne Arnold, Manager, EPA Region 1 Air Quality Planning Unit,  
[arnold.anne@epa.gov](mailto:arnold.anne@epa.gov)
- Mr. Donald Cooke, Conformity and mobile monitoring, EPA Region 1 Air Quality,  
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- Ms. Mary Beth Mello, Regional Director, Federal Transit Region 1,  
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- Richard K. Sullivan, Secretary  
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- Curt Spaulding, Administrator, Region 1  
Rosemary Monahan, Smart Growth Coordinator

Jeff Reese Comments regarding GLX delays

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- Mr. Richard A. Davey, Secretary and CEO of the Massachusetts Department of Transportation (MassDOT), 10 Park Plaza, Suite 3170, Boston, MA 02116
- Jonathan R. Davis, Acting General Manager, Massachusetts Bay Transportation Authority, 10 Park Plaza, Suite 3910, Boston, MA 02116
- **Lisa P. Jackson, EPA Administrator, US EPA Headquarters**, Ariel Rios Building, 1200 Pennsylvania Ave., N.W., Washington, DC 20460
- **Peter M. Rogoff: Administrator, U.S. Department of Transportation, Federal Transit Administration**, East Building, 1200 New Jersey Avenue, SE, Washington, DC 20590

Jeff Reese Supplemental Comments after the 9/13/11 MassDEP meeting

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**RE:** Supplemental comments about the "SIP transit commitments," the "Boston MPO 2012-2015 TIP" and the "Boston MPO LRTP" after the Public meeting 9/13/2011 at the MassDEP offices.

To whom it may concern:

I have already (prior to the 9/13/2011 meeting) submitted official comments regarding the Green Line Extension delays. This letter is meant to supplement, but not replace those comments, with additional comments regarding the meeting I attended last night.

I believe it was Mr. Mohler who, about 2 hours into the meeting, said that neither he, nor anyone on the GLX planning staff, thought that 2014 or 2015 was an achievable schedule. I'm still not buying it. Give me a shovel and I'll start digging today and could get this project done in 9 years myself! 9 years is an absurdly long time for a project that is in an existing right of way.

There are 3 basic components of any project: 1) cost, 2) schedule, and 3) quality. Had you asked me 10 years ago if I thought cost was important, and whether we should get federal funding I would have said yes, but at this late stage of utter neglect, I no longer care about cost, especially since the cost of mitigation and delays would exceed the cost of getting it done on time. Had you asked me 10 years ago if I wanted nice, fancy stations, I probably would have said "sure", but at this late stage of utter neglect, I can live with lower quality. **All I care about now is schedule.** All I'm asking is that the bare bones of barely functional transit system be operational before the deadline, and you can add the finishing touches after the deadline. For now, just give me a functioning track, green line cars running on it, a platform to board it from, and a way to access that platform. Cut or delay any non-essential scope. Here are a few suggestions:



- **Maintenance Facility:** build it last, AFTER you have bridges lengthened, retaining walls built, utilities moved, platforms built, and everything else that is on the critical path to getting trolleys moving. Either start it, or continue working on it, after the GLX is up and operational. I don't care if transporting trolleys in need of repair to somewhere in Brookline is a pain in the butt for the MBTA, they can live with it for a few years after the GLX is operational while the maintenance facility is still being built in Somerville. Get the GLX operational by 2014, and then worry about getting the maintenance facility operational sometime between 2015 and 2020. If delaying it reduces the scope of work and speeds up the schedule for getting the GLX running, it should be done. The maintenance facility is already a huge concession on the part of Somerville, and it is not a part of the legal mandate for the GLX. This should help speed up property acquisitions too, since the most severe property takings are for this facility.
- **Stations:** Build temporary (or permanent if they can later be incorporated into full station designs) platforms with simple handicap elevators and exterior stairs down to the platforms to get the system up and running on time (2014). Then later (2015-2020) build the "real" stations around the temporary platforms, elevators, and stairs. It might take some creative engineering, but if it cuts time out of the schedule for getting things operational then it should be done. Like I said in my previous comments: I don't care if I have to wait for a trolley in the rain or snow, just so long as I have a trolley to wait for.
- **Contractors and Design Team:** If the contractors and design team selected aren't up to the challenge or have insufficient personnel, then maybe they should be replaced or their scope of work reduced and other parts of the work given to other contractors or design teams to expedite the schedule. Get one team whose sole task is excavating and installing retaining walls. Get a different team whose sole task is sound abatement. Another team whose sole task is station designs. Another team whose sole task is the maintenance facility. And so on until you get one final team whose responsibility is to coordinate all the different teams and assign and prioritize tasks.
  - o You show final Retaining Wall designs not being due until July 22, 2014. That's nearly 3 years from now. I am a structural engineer. Give me the site survey, final grades, soil conditions, and design parameters and I can get retaining wall designs to you in a matter of a few weeks. This demonstrates how ridiculously long you think the design schedule needs to be.
  - o Similarly, Station designs are shown as not being due until May 20, 2015. My architect friends and I could bust out a complete station design in about 2 months. Incorporate enough mini-teams of architects and engineers like us and you could have ALL the stations designed in a matter of a few months rather than 3.5 years.
- **Funding:** Either work with New Starts to allow the project to proceed on schedule prior to receiving New Starts funding, or abandon New Starts.
- **Compress the schedule for state reviews:** This should be the state's top priority project. Add staff if you need to, and make this project their top priority, so that



Jeff Reese Supplemental Comments after the 9/13/11 MassDEP meeting

review processes shown on the schedule as taking 3 weeks or more get done in 1 week (such as "Review VHB Doc. & Commence Design").

- **Work in 2013:** On your detailed schedule, nothing but congressional review and property acquisitions appears to be happening in the entire year of 2013. Continue working during this congressional review and property acquisitions period. You shouldn't be stopping for a year in the middle of the project.
- **Use the state's power of eminent domain:** I find it hard to believe that property acquisitions would take 2 years. This project is critical to the well-being of this area, and if ever there were a project that exemplified the justification for eminent domain, this would be that project. The state should be flexing its muscles and making this happen MUCH faster than that. Take business properties immediately, rent the same building back to the company using that building during GLX design to give that company time to move out (charging them either the same as their mortgage or maybe even letting them use it for \$1/month if you really want to sweeten the deal), and then terminate the lease and kick them out on the day that their property is scheduled for GLX construction. Subsidize companies for lost time if you need to kick them out before their new facility is ready.

Sincerely,

Jeff Reese

Current resident of Medford, MA

Current property owner in and former resident of Somerville, MA

Cc:

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## Comments on Draft Regional Transportation Plan

The Regional Transportation Plan for 2011 (Paths to a Sustainable Region) seems to support the admirable goal of developing a sustainable, green transportation system. For example, under Livability, the vision is that “all residents will have the capability of moving affordably between where they live, work, get services, and play using healthy transportation options that promote a healthy lifestyle.” Under Environment “increase mode share for transit and non-motorized modes” and under Climate Change “tie transportation funding to VMT reduction” and “support stronger land use and smart growth strategies”. Based on the MPO's Visions and Policies as articulated in the Plan we would expect a major break with the past, with investments and programs promoting smart growth, reducing greenhouse gases, and promoting transportation equity.

Instead, the projects listed in Table 8-3 demonstrate a commitment to more of the same, with 87% of all funds allocated to roadway projects, including 42% to roadway capacity expansions, and way less than 1% of all funding devoted to the most sustainable, environmentally-sensitive modes, walking and biking. There are only two “paths” and only \$36.8 million of the \$5.8 billion in highway funds are allocated to these sustainable modes in the region. Besides their well-documented health and environmental benefits, the fact that these types of projects cost little to build, even less to operate/maintain, and cost virtually nothing to use should make them a priority in these fiscally-constrained times. Overall the Plan shows negligible increases in transit, walking, and biking mode shares and the combination of projects is forecast to actually increase vehicle miles traveled in the region.

Given such inherent internal contradictions, and the lack of compatibility with MassDOT's stated intention to become GreenDOT, I urge the MPO to reject this Plan until it is amended so that the allocation of resources bears at least some resemblance to the stated priorities and provides a least a few of the intended benefits. And of course the first place to demonstrate this reallocation would be in a renewed commitment to complete the Green Line Extension construction by the end of 2014, as legally and morally required.

A few details to note:

1. The modeling results for this Plan show only a 2 to 0% increase in transit and non-motorized trips, an actual 57,000 mile increase in vehicle miles traveled, and a very small (9,900/3,772,300=0.26%) reduction in vehicle hours of travel versus the No-Build alternative (also the No Cost alternative). All of these numbers are much less than the error-rate inherent in the model. There is no difference between the No-Build and the Recommended Plan and no demonstrated benefits to any of the modes that are the intended beneficiaries of the Plan and the reason for the expenditures of over \$5 billion.
2. The Plan under review, Paths to a Sustainable Region, actually provides less funding for sustainable projects than the previous one, Journey to 2030. Less for bike paths (the Assabet Rail Trail moved from 2011 to 2016), a reduced commitment to the Green Line (less than full funding for “Phase 1” and, while the Green Line College Ave to Route 16 still shows in the 2016-20 band, it will certainly be delayed if the delay to the rest of the extension to at least 2018 happens as proposed) and the change of the Suburban Mobility program (funding small transit projects) into the Clean Air and Mobility program (funding, besides transit and walk/bike projects, roadway projects with air quality benefits (reducing emissions over “normal” roadway projects)). No only is there almost no commitment to non-motorized modes and transit projects, but, as noted on page 8-3, 87% of funding is allocated to roadway projects, including 42% to roadway expansion.

3. A Plan committed to sustainable modes and MassDOT's Healthy Transportation Compact would make it a priority to make all communities walkable and bikeable. Not only would such a Plan significantly reduce emissions (in spite of the model's current inability to accurately reflect such a scenario), provide health benefits (increased exercise and reduced emissions), and foster economic activity (except for drive thru windows, all economic activity must include walking at both ends of the trip), but providing the necessary infrastructure to make all communities walkable and bikeable would cost less than the \$200-500 million devoted to just one large roadway project in the Plan.
4. As a start, a Plan committed to sustainable transportation would include building the Community Path Extension concurrently with the Green Line Extension. The current rebirth of Davis Square did not truly begin until the Community Path opened thru there, and the Green Line Extension will only reach its full transportation and economic development benefits with the access provided by the Community Path Extension. In addition, there are many other worthy paths under development around the region and those that can demonstrate any significant amount of transportation use should be funded in a sustainable transportation plan. And "transportation use" should not be limited to work trips, which are only 20-25% of all trips, but rather any trip which could provide some economic benefit to the region.
5. A Plan committed to sustainable transportation would include a commitment to develop processes to encourage low-cost walking and biking projects easily and quickly. Instead, as we learned in the Clean Air and Mobility Program, the current bureaucratic project development process has no way to efficiently expedite any small, low-cost project, regardless of the level of theoretical commitment to the idea. And the draft Plan does nothing to change this.
6. There seems to be a typo on p. 8-3, where a "not" is missing between "generally" and "consistent" in the following statement [the Plan] "is generally consistent with MetroFuture, the land use plan for the Boston region, and with the sustainable-development principles of the Commonwealth."
7. Inconsistencies with sustainable development principles have been discussed above. MetroFuture is based on goals of sustainable growth patterns, transportation choices, and a healthy environment, among others. But Metro Future will not happen because we wish it to be true. It will require supportive land use policies and a transportation network that will allow and support the trips that will be demanded by those hoped-for land use patterns. This proposed transportation plan will not only not support that MetroFuture but will make it impossible to occur.
8. With the exception of the Green Line Extension, which the state now proposes to postpone indefinitely (until (if) some future administration can figure out how to do it) there are no projects not already under construction funded in this Plan that will have any benefit for environmental justice (EJ) communities (called transportation equity in this document - probably a better term, but just adding to the jargon confusion in a jargon-laden document). All the roadway expansion projects, by bringing ultra-fine particulates closer to adjacent populations, will have negative health impacts on EJ and non-EJ communities alike. This is not consistent with the Plan's previously stated goal of minimizing "environmental burdens from transportation facilities". None of the needs identified on page 6-4 are addressed (the need for Complete Streets and better circumferential transit, including the Red-Blue Connector, for example).
9. While devoting a significant portion of the available transportation funding to maintaining the existing (mostly roadway) system may seem like a prudent public policy choice, and certainly maintaining safe infrastructure is a worthy objective, the consequence, perhaps unintended, is also maintaining the harmful health and environmental impacts that come with the existing system. Since the walking and biking modes can have vast increases in needed infrastructure at (relatively) little cost, there should still be sufficient resources to fund needed safety projects (safety meaning bridges and roads that don't collapse, not necessarily projects that protect users from unsafe drivers). And of course a green plan would expand transit before expanding roadways.

Finally, a few words on the Plan document. I appreciate the efforts that have been made to reduce the number of pages in the Plan (although reducing Regional Needs to 16 pages while spending 37 pages writing about Transportation Systems Operation and Management, for example, seems a misdirected priority). Still, a Plan that “weighs in” at over 250 pages, not including Appendices, is not a useful document for public review. And while I appreciate the attempt to simplify made with the Executive Summary (those of us who aren't “Executives” are supposed to have time to read the whole document?) the 11 pages included there include far too little information on which to make any informed decision.

The year is 2011, but you are presenting information using a paradigm developed over 2000 years ago (a book). The essence of “the Plan” is “where do we want to be in 25 years and how will we get there”. I read a lot of words about “Visions” for the future, but I still don't understand what the “Vision” is, let alone how the funded projects will help us get there. And everything else in the current document is background. We (the public) may want to know some of that background, or not (I would like to know why you defined the needs you did, for example, but now that's not even in the Appendices). We may prefer words, or numbers, or pictures, maybe even a movie. And I'm pretty sure none of us want to learn a new language (transportation jargon) to understand what the Plan is.

Whenever the draft Plan ideas become final, I urge you to continue to work on better ways to present those ideas, until all the residents of the region who are interested in our transportation future (that would be most of us) actually participate in designing their future.

Thanks for the opportunity to comment.

Jim Gallagher