



Massachusetts Department of Transportation

State Implementation Plan – Transit Commitments
2009 Annual Status Report
Agency Responses to Public Comments

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INTRODUCTION

This document summarizes and responds to public comments received by the Massachusetts Department of Transportation (MassDOT) on the *State Implementation Plan - Transit Commitments 2009 Annual Status Report* (the Status Report) submitted to the Massachusetts Department of Environmental Protection (DEP) on July 1, 2009 in order to fulfill the requirements of 310 CMR 7.36(7), *Transit System Improvements*. The Status Report detailed the status of five public transit projects – listed below – required of MassDOT under 310 CMR 7.36. The projects are:

- Blue Line Platform Lengthening and Modernization
- Fairmount Line Improvement Project
- Construction of 1,000 New Commuter Parking Spaces
- Red Line/Blue Line Connector - Design
- Green Line Extension to Somerville and Medford

This document also responds to questions on projects not included in the Status Report.

MassDOT received public comment on the Status Report through September 15, 2009, following a public meeting (September 9, 2009) at which staff from MassDOT (then the Executive Office of Transportation) presented on the content of the Status Report. The majority of the comments received by MassDOT pertain to the extension of the Green Line to Somerville and Medford. MassDOT has reviewed all of the comments received – they are included here in full, as is a list of all of the submitting individuals and organizations – and has grouped and summarized them so as to capture the salient ideas while reducing redundancy and overlap. As much as possible, we have listed the comments here in the same language as that used in the original comment, with clarifying notes as needed. In this document, indication of the authorship of each comment has been omitted.

Project Critical Path Issues

A number of critical path issues have arisen or are becoming clearer for several of the SIP-required projects since the submission of the Status Report in July. They are listed here:

Green Line Extension to Somerville and Medford

- The challenge of siting a northside support facility for the storage and maintenance of Green Line vehicles – a facility integral to the implementation of the Green Line Extension as a whole – has proven formidable, just as it was at this time last year. MassDOT is continuing to work on the issue and, with public and municipal input and collaboration, hopes to have a resolution soon.

Construction of 1,000 New Parking Spaces

- The process of identifying appropriate locations in which to construct the required 1,000 new parking spaces has been lengthier than expected. While the effort is now underway and locations for the construction of new large-scale MBTA parking facilities have been identified (to date: the MBTA Commuter Rail stations in Salem and Beverly, as well as a transit-oriented development project at Wonderland Station), the exact timeframe within which all of the 1,000 spaces will be constructed is not fully defined. Current projections suggest that the Wonderland Station project will be in construction at the time of the required SIP deadline of December 31, 2011, but substantial completion will likely occur several months after the deadline. Likewise, both the Salem and Beverly projects may be completed after the required SIP deadline of December 31, 2011. In addition, however, the MBTA is and will continue to pursue other parking projects that will support the SIP requirement,

including the construction of parking at Quincy Shipyard (168 new spaces currently under construction and anticipated for completion in 2010), Savin Hill station (30 new spaces completed), and Sullivan Square station (10 new spaces completed). MassDOT and the MBTA will continue to seek out all viable opportunities to add commuter parking to the MBTA system, while also pursuing large projects like those at Salem, Wonderland, and Beverly. Should construction estimates project that all 1,000 spaces will still likely not be completed by the SIP deadline, the delay would trigger the need for MassDOT to collaborate with DEP to publicly develop a mitigation proposal for the interim months.

Fairmount Line Improvement Project

- The Fairmount Line Improvement Project requires the construction of four new MBTA Commuter Rail stations, one each in the general location of Four Corners (Dorchester), the neighborhood of Dorchester, the neighborhood of Roxbury, and the neighborhood of Mattapan. Current construction projections suggest that the Four Corners station will be completed four-six months after the SIP deadline of December 31, 2011, while the Dorchester (Talbot) and the Roxbury (Newmarket) stations will be delayed by approximately six-nine months. Should these projections prove accurate, the delay would trigger the need for MassDOT to collaborate with DEP to publicly develop a mitigation proposal for the interim months. In addition, abutter concerns have recently arisen about the preferred location for the Mattapan station – between Blue Hill Avenue and Cummins Highway, with access from both streets – and MassDOT and the MBTA are now analyzing a new potential station location. The time required for the additional analysis may also impact the final completion schedule for the overall Fairmount project.

Public Input

The projects described in the Status Report each have public input processes associated with them, but the public process associated with the State Implementation Plan (SIP) itself provides an additional opportunity for MassDOT to hear from interested individuals and organizations about the progress and direction of our projects. This is a valuable reminder that our projects will serve real people in real communities, and we strive always to shape our efforts to meet the needs of the users of the transportation network, both present and future. At the same time, the framework of the SIP obliges us to retain a regional perspective and to understand that the portfolio of projects mandated under the SIP is intended to work together to bring benefits to the Boston Metropolitan Region as a whole. Furthermore, MassDOT and the MBTA must always be sensitive to the overall constrained fiscal climate of both the transportation agencies and the Commonwealth as a whole. With those issues in mind, we are grateful to the individuals and institutions who participated in this public comment process and who participate in the development of ongoing transportation projects.

This document follows the general format of the Status Report submitted on July 1, 2009, which is also included in this binder.

A Note of Clarification

- On November 1, 2009, the Executive Office of Transportation became the Massachusetts Department of Transportation, per legislative change. This document makes use of both agency names, based on the language used in the comment letters received. For all future documents, only 'the Massachusetts Department of Transportation' will be used.

I. BLUE LINE PLATFORM LENGTHENING AND MODERNIZATION

Public Comments

- *[We] disagree with EOT's oft-repeated claims that its obligations under the SIP commitment are complete by virtue of implementing 6-car train service despite the failure to modernize all Blue Line stations...The failure to modernize all Blue Line stations is a continuing violation of the SIP, which required that Blue Line station modernization be completed by 2008.*

As was described in the 2008 *Agency Responses to Public Comments*, Blue Line station modernization is important and the MBTA is aggressively trying to complete the necessary work, but MassDOT does not believe it to be a required part of the SIP commitment. The SIP regulation does not reference work on the Blue Line stations themselves; it only references the lengthening and modernization of the platforms, as the air quality benefit derives from giving the MBTA the ability to run longer trains and thereby provide greater capacity for more passengers. The MBTA has lengthened and modernized the Blue Line platforms so that they can accommodate six-car trains. That work was completed in time for the 2008 SIP deadline, and all peak-period Blue Line trains now include six cars. The overall Blue Line station modernization work is ongoing, with construction at State currently underway. The MBTA anticipates initiating modernization construction on the stations at Orient Heights and Government Center in 2011.

II. FAIRMOUNT LINE IMPROVEMENT PROJECT

Public Comments

- *The SIP Status Report includes general statements that each of the [Fairmount] stations will be completed on schedule. However, given the recent failure to meet an interim deadline, [we] request a clearer explanation on how all stations will in fact be completed by December of 2011.*

MassDOT and the MBTA are working in concert to make all components of the Fairmount Line Improvement project go as quickly as possible, and are committed to trying to substantively complete as much of the project as possible in time for the SIP deadline of December 2011.

After unexpected delays, the construction of Four Corners station will begin in the spring of 2010 and is anticipated to continue for 24-27 months, resulting in a delay of three-six months.

The Dorchester (Talbot) and the Roxbury (Newmarket) stations will be advertised for construction shortly; MassDOT and the MBTA currently estimate that the completion of those stations will be delayed by approximately six-nine months beyond the SIP deadline.

As mentioned in the Introduction to this document, recent abutter concerns about the location of the new Mattapan station may also challenge the overall project schedule. The MBTA is working to analyze an alternative location for a Mattapan station, and anticipates working with the relevant neighborhoods to try to find a resolution to locating a Mattapan station.

MassDOT and the MBTA have begun the process of analyzing the air quality implications of these limited projected delays for the Fairmount Line Improvement project. Once we have developed this data, MassDOT and the MBTA will work with DEP to publicly develop an interim air quality improvement solution for the months prior to the final completion of the stations.

- *[We] renew our request that EOT identify and report on service improvements to increase ridership for the Fairmount Line.*

While the SIP doesn't directly require an increase in service levels on the Fairmount Line, we believe it would be a valuable exercise and in the spirit of the SIP to consider whether a higher level of service would attract significantly higher ridership. Given that, we believe that the most prudent course of action is to review the existing Fairmount Line service plan once the new stations are close to being operational. Any service improvements would not be put in place until the new stations are open.

III. CONSTRUCTION OF 1,000 NEW PARKING SPACES

Public Comments

- *While it is clear that EOT has made some efforts to identify potential parking spaces to comply with the Parking Commitment, it also does not seem that the Parking Commitment is being strategically addressed. EOT should identify locations where parking constraints are limiting transit ridership and seek to increase parking in those locations.*

Since the publication of the Status Report in July, MassDOT and the MBTA have identified and initiated extensive planning work on new parking projects at three MBTA stations: Commuter Rail stations at Salem and Beverly, and Wonderland on the Blue Line (Revere). These three projects could all support MassDOT and the MBTA in their efforts to fulfill the SIP 1,000-space requirement. In addition, the MBTA is and will continue to pursue other parking projects that will support the SIP requirement, including the construction of parking at Quincy Shipyard (168 new spaces currently under construction and anticipated for completion in 2010), Savin Hill station (30 new spaces completed), and Sullivan Square station (10 new spaces completed). MassDOT and the MBTA will continue to seek out all viable opportunities to add commuter parking to the MBTA system, while also pursuing large projects like those at Salem, Wonderland, and Beverly.

The Wonderland project is worth particular note because it is advancing quickly, in part due to funding from the American Recovery and Reinvestment Act (ARRA). The availability of ARRA funding is making it possible for more Wonderland parking spaces to be completed more quickly than originally anticipated.

Completion of all of the projects identified here will provide new commuter parking spaces in excess of the 1,000 required by the SIP.

- *While we recognize that municipal cooperation is important to achieving this commitment, EOT should be taking a leadership role in identifying optimal new parking space locations and actively working to gain municipal and other support for the construction of these parking spaces.*

The construction of any transportation project requires a careful balancing of regional needs and municipal support and participation. In service of siting the SIP-required parking spaces, MassDOT and the MBTA have invested significant time and resources not only to identify logical locations at which to construct new parking but also to develop local support for such facilities. To meet the requirements of the SIP, new parking facilities must be sited where they are needed and will provide benefits, but – to be in the spirit of good planning – they must also be sited where they will be welcomed by the surrounding communities.

IV. RED LINE/BLUE LINE CONNECTOR - DESIGN

Public Comments

- *[We] continue to feel that construction of the Red Line-Blue Line Connector is essential for improving the MBTA system in order to reduce air pollution and improve mobility throughout the region.*

MassDOT is currently in the process of completing a Draft Environmental Impact Report and conceptual engineering for the Red Line/Blue Line Connector project, in service of meeting the SIP deadline of completed final design by December 2011. The planning and design materials are all being prepared to a level of rigor and public input so that the project could be built efficiently if construction funding were to become available. However, given the extremely limited availability of construction funding for transportation projects as a whole – and MBTA projects in particular – MassDOT has no near-term plans to construct the Red Line/Blue Line Connector project. While the project offers benefits for riders and for the MBTA system, funding simply isn't available to support its construction.

V. GREEN LINE EXTENSION TO SOMERVILLE AND MEDFORD

Public Comments

- *The SIP Status Report does not provide adequate information about the Commonwealth's funding plan for this project, either in the case that the project does not receive New Starts funding, or in the case that it does receive New Starts funding and a state match is required...Ultimately, this project is a Commonwealth obligation and the Commonwealth should take all steps to ensure that adequate funding is available for all components of this project whether or nor federal funding is secured.*

MassDOT has been consistent in its assertion that the Commonwealth will use state monies to fund whatever portion of the costs of the Green Line Extension project are not supported by other means, most notably New Starts funding from the Federal Transit Administration. MassDOT is currently preparing its New Starts application materials, and is working closely with the Federal Transit Administration to understand and conform to all the requirements of the application process. Should the New Starts application be unsuccessful, MassDOT will make use of bonds issued by the Commonwealth to fund the Green Line Extension project. Should the New Starts application be successful, MassDOT will also make use of Commonwealth bond funds to support any non-federal share required to 'match' New Starts funding. Should no federal (or other non-Commonwealth) funding be made available for the Green Line Extension project, MassDOT would likely need to reconsider all of the components of the project to make sure that all of them could be funded by the Commonwealth alone. The Commonwealth is fully committed to bringing the Green Line Extension project to realization, but many other areas of state government – both transportation and non-transportation – require state funding, and those needs must be balanced as well.

The current Transportation Improvement Program for the Boston Region Metropolitan Planning Organization identifies both the state and federal funding projected to be used for the Green Line Extension project during FFY 2010-2013.

- *[We] request a detailed project schedule that provides information about how the Green Line Extension will be completed by December 31, 2014, as required by the SIP...If it is not possible to complete this project on time, the Commonwealth should be planning for interim mitigation now.*

On October 15th, 2009, MassDOT formally submitted a Draft Environmental Impact Report/Environmental Assessment (DEIR/EA) for the Green Line Extension project, thereby meeting both a major milestone in the planning of the project and an interim deadline of the SIP. Due to public requests for an extended comment period, the DEIR/EA remains under public and agency review and MassDOT does not expect the Massachusetts Environmental Policy Act (MEPA) Office to respond to the document and the public comments until mid-January 2010. Simultaneously, MassDOT is working with the Federal Transit Administration to endeavor to advance the Green Line Extension project into Preliminary Engineering, the next major step in project development. Once MEPA responds to the DEIR/EA, MassDOT will then be able to develop a revised project schedule for the next phases of the project.

At this point, MassDOT continues to believe that the December 31, 2014 deadline is aggressive but achievable, and so it is not necessary to plan for interim mitigation now.

The DEIR/EA can be found at <http://www.greenlineextension.org/currentmaterials.asp?area=mls>.

- *[We] feel that completion of all segments of this project, including the Union Square spur and a full-length spur to Route 16, is necessary to achieve the air quality improvements promised through this project. [We] have requested that EOT provide the public with analysis of air quality benefits of all project options and a comparison of those to the benefits modeled when the revised SIP was proposed and approved.*

The DEIR/EA for the Green Line Extension project provides detailed information on the air quality impacts for each of the various studied alternatives. That information is available at https://www.commentmgr.com/Projects/1228/docs/012_DEIR-EA_V1_CH5_Environmental_Consequences.pdf. Additionally, a detailed discussion of the Green Line Extension project as it relates to the current approved SIP can be found in Section 5.6.8, *Metropolitan Planning and Air Quality Conformity*, of the DEIR/EA.

Although MassDOT has been consistent in its support for and efforts towards an ultimate full-build of the Green Line Extension project that includes a station at Route 16/Mystic Valley Parkway, the air quality benefits promised through the SIP can and will be achieved by a Green Line Extension that reaches Union Square in Somerville and College Avenue in Medford by December 31, 2014.

- *We suggest that EOT provide within its DEIR preparation [of] an affordable, substitution recommendation in case federal dollars are not obtained.*

The purpose of a DEIR is to examine the environmental impacts – broadly defined – of a set of alternatives associated with a particular transportation project or proposal. It is not the place to propose a substitute project, nor does MassDOT feel that such a substitute proposal is warranted or appropriate. MassDOT is committed to pursuing the Green Line Extension project.

- *Diesel particulates coming from buses, trucks and older commuter and freight rail engines are tied to this project. Rail engines will not be electrified as originally reported. We believe this mitigation issue will create an undue environmental burden upon our community.*

The Green Line Extension project never included any proposal for electrification of rail engines, although the Green Line vehicles themselves are electric and will run on electric power. The MBTA has upgraded the vast majority of its bus fleet so that few buses remaining on the road make use of diesel fuel. Likewise, MBTA Commuter Rail locomotives will be modified in coming years to accommodate low-sulfur diesel fuel, which runs cleaner and pollutes less than conventional diesel fuel. The purpose of the DEIR/EA currently available for public review is to estimate potential community impacts from a proposed project and provide recommendations for potential mitigation, if warranted. In the instance of the Green Line Extension project, air quality mitigation will only be necessary during construction and measures have been identified in the DEIR/EA to minimize those short-term impacts. MassDOT and the MBTA will work with the corridor communities of Cambridge, Somerville, and Medford to develop a mutually-acceptable mitigation plan for the period of construction.

- *We believe EOT has pushed a recommendation for a Route 16/MVP (Mystic Valley Parkway) terminus that abuts vulnerable populations without providing evidence that there is no undue environmental burden. Without these studies we must contend the state is trying to hide an undue burden upon a*

historical African American community, the disability community and young children. In fact, EOT made their recommendation of Route 16/MVP with only 10%-30% of studies completed based upon their own admission.

The DEIR/EA submitted on October 15th, 2009 includes a thorough and complete environmental review of all aspects of the Green Line Extension project, including the impacts of each of the project alternatives on environmental justice populations. Complete environmental assessments of a potential Green Line station at Route 16/Mystic Valley Parkway, including impacts on land use and environmental justice populations, are presented in the DEIR/EA. Engineering plans for the Green Line Extension project are currently only at the 10% conceptual stage, and those plans are included with the DEIR/EA. MassDOT has proposed a Green Line station at Mystic Valley Parkway/Route 16 for a future phase of the Green Line Extension project (following the December 31, 2014 SIP deadline required for Green Line service to Union Square in Somerville and Medford Hillside). As is true for the entirety of the Green Line Extension, plans for that station will continue to be refined and improved, with community input and collaboration, as the project moves forward. MassDOT strongly objects to the assertion that it is hiding any evidence of undue burden, particularly to vulnerable populations. On the contrary, we believe this project to have significant benefits for populations and neighborhoods long underserved by public transit.

- *[MassDOT] should re-look at its tunnel costs in light of what other states have been able to achieve for better environmental benefit to communities at an affordable price.*

In response to community interest, MassDOT performed a concept-level evaluation of the benefits, costs, and parameters of placing some of the extended Green Line underground. This evaluation can be found at:

https://www.commentmgr.com/Projects/1228/docs/Draft%20Document-TunnelAlts_11252008%20for%20posting.pdf.

MassDOT has rejected tunnel alternatives for the Green Line Extension project for a number of reasons, including: (1) costs, which have been estimated to be unaffordably high, (2) the inability to efficiently meet the geographic requirements of the SIP by traveling underground, and (3) the efficiencies provided by using the existing surface railway rights-of-way proposed for the Green Line Extension. We continue to believe this was the right decision for the project.

- *It is somewhat disconcerting that EOT's conceptual design for the Route 16 station shows the need to obtain four large commercial buildings. It is crucial to the success of the Route 16 station, and to the project overall, that the Preliminary Engineering include a mandate to reduce the need for property acquisitions at this site.*

As explained above, MassDOT has proposed a second phase of the Green Line Extension project that will continue the Extension to a station at Mystic Valley Parkway/Route 16. As with the rest of the project, significant engineering work must still be done for a future Mystic Valley Parkway/Route 16 station, including reconsideration of all property acquisition needs at the site. MassDOT understands community concerns about proposed property acquisitions in the vicinity of the future Mystic Valley Parkway/Route 16 station, and will work internally and with Medford and Somerville to attempt to develop a design for that area that minimizes land acquisitions.

- *I remain in disagreement with EOT's arbitrary definition of 'Medford Hillside' as the area between College Avenue and Winthrop Street in Medford...College Avenue is the extreme southern end of the Hillside neighborhood and a station there would not be convenient to much of this community...*

The SIP requires that the Green Line be extended to Medford Hillside, and MassDOT feels confident not only that College Avenue offers the best balance of benefits and impacts of any potential station location in the immediate area but that it also fulfills the legal commitment for the Green Line Extension to reach Medford Hillside. Due to the proximity of Tufts University and surrounding residential neighborhoods, a College Avenue station promises to draw riders to the Green Line. In addition, the impacts of the station can be effectively mitigated at that location, a location which has the support of the City of Medford (unlike other proposed locations in the area). Furthermore, the need to acquire property at this location is minimal. For these reasons, we believe that not only does College Avenue meet the spirit of the SIP, it provides the best location for a Green Line station.

- *The Annual Report again omits any mention of an important area of concern in the community – mitigation, particularly in terms of additional noise and vibration that will occur when the commuter rail tracks are moved closer to existing residences.*

As mentioned above, the DEIR/EA includes a discussion of mitigation options available to address the various impacts resulting from the Green Line Extension project, including noise and vibration impacts. MassDOT has identified in the DEIR/EA those geographic areas within the Green Line Extension corridor at which noise and vibration mitigation would be required. MassDOT and the MBTA will continue to working collaboratively with the corridor communities and abutting residents and business to further develop mitigation plans for the overall project.

- *The Inner Belt represents a significant Inner Core development opportunity to the Commonwealth. It is four times the size of neighboring NorthPoint and encompasses up to 10 million square feet of development potential. The expanse of the district, and its location near downtown Boston and Kendall Square, certainly calls for future transit support beyond the proposed Brickbottom station on the far western edge.*

MassDOT is aware of public and municipal aspirations for the Inner Belt area, and believes that the Green Line Extension has a large and vital role to play in whatever urban transformation takes place there. For current planning, we believe that the proposed Brickbottom Station is appropriately located to serve current residents and businesses in the area, and we are working to design the station with maximum visibility and access. We have also and will continue to collaborate with the City of Somerville to identify appropriate locations for possible future stations – and, as appropriate, other public transit options for the area – but do not feel that additional Green Line Extension stations are warranted at this time.

- *The 2009 Status Report gives no indication of the status of the Winthrop Street station.*

As part of the development of the DEIR/EA, MassDOT evaluated multiple locations for a Green Line Extension station in the Medford Hillside area. One of those locations was proximate to Winthrop Street. Following public workshops and, most importantly, input from the City of Medford, MassDOT concluded that a station in the Winthrop Street area would not be able to gain sufficient public support to be viable at this point.

- *DEP – and all of us – would benefit from an ‘early warning system’ that would flag financial problems that would derail the Green Line Extension. Estimated project costs have already outstripped financial resources.*

While it is true that the current cost projections for the Green Line Extension project are greater than the funds committed for SIP projects in the 2007 Transportation Bond Bill, it does not mean that no additional Commonwealth funds could be made available for the Green Line Extension project. The DEIR/EA lists the current cost projections for the project by analyzed alternative, and project costs will be further refined as the design of the project progresses. MassDOT works closely with the Executive Office of Administration & Finance on issues of project cost, and will continue to do so over the life of the project.

- *I would also ask for clarification whether the Lechmere Station relocation is now within the scope of the Green Line Extension or not.*

The costs of relocating Lechmere Station have been absorbed into the overall costs of the Green Line Extension project.

VI. OTHER PROJECTS AND POLICIES

MassDOT received public comment on projects not directly covered in *State Implementation Plan - Transit Commitment Status Report*. Those comments and attendant responses are listed below.

- *It is now obvious that EOT is not in compliance with its obligations under the SIP commitments, based on its prior experience of delay in completing environmental engineering studies on urgently needed transit improvements. So DEP has an obligation to immediately require mitigation for delay. [We] are recommending that the following should be required as mitigation:*
 - *Revise and develop more aggressive timetable particularly for the Green Line Extension.*
 - *Additional required maintenance and continuation of transit projects on the RTP (Regional Transportation Plan for the Boston Region MPO) as Illustrative & Funded projects. These must include:*
 - A. *Silver Line Phase III*
 - B. *Urban Ring*
 - C. *Red & Blue Connector*
 - D. *Fairmount Line*

Given the enormous financial constraints under which the MBTA is currently operating, the addition of multiple new transportation projects – each complex and costly in its own right – to the current list of SIP and SIP-related commitments would be infeasible. MassDOT and the MBTA are advancing the current SIP projects as well and as quickly as we can, and is committed to continuing to do so. MassDOT is not in a position where mitigation, particularly mitigation of the scale and scope described above, is either required or reasonable.