



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

Jerome Grafe
Department of Environmental Protection Bureau of Waste Prevention
One Winter Street
Boston, MA 02108

September 12, 2011

Dear Mr. Grafe:

We write today to offer comments on MassDOT's annual Status Report on transit projects required under the revised State Implementation Plan, issued on July 27, 2011. We object most strenuously to the proposed six year delay in completion of the Green Line Extension to Somerville and Medford (GLX). Timely completion of this project, originally scheduled to have been done by December 31, 2011, is a legal obligation of the Commonwealth, and should not continue to be "kicked down the road" by MassDOT.

The Green Line Extension is an extremely high priority for all of us and the cities we represent, as well as an imperative for the Commonwealth, for environmental, legal and economic reasons. Delaying this project will delay all its benefits and add at least an additional \$200 million to the cost of the project. The delay proposed in the MassDOT Status report is reinforced by the stripping of the GLX funding and timetable from the RTP and 2012-2015 TIP by the Boston MPO.

Any delay in the Green Line Extension delay will put the Commonwealth in violation of the State Implementation Plan and the transportation provisions of the Clean Air Act. We ask that DEP reject the proposed new completion 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 – indeed, most eminent domain takings are done expeditiously, on a pro tanto basis, and disputes in valuation revisited at a later date. 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.

DEP should require DOT to 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. DEP should require that multiple schedule deadlines be set 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.

We ask DEP to require MassDOT to accelerate progress on the GLX and put forth a CREDIBLE funding plan that will ensure the timely completion of the Green Line Extension and 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