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June 21, 2007

Statement to the MBTA Hearing on the Program for Mass Transportation, 2008

The Association for Public Transportation (APT) welcomes the opportunity to offer the following comments in connection with the 2008 Program for Mass Transportation. APT was founded in 1973 with the mission to support all aspects of public transportation and we always attempt to be supportive of the MBTA. APT is the author of the book *Car-Free® in Boston*, which is now in its tenth edition.

In the case of the Program for Mass Transportation, APT has developed, with the input of its members and the consensus of its Board, a series of priorities for implementation in the near future—three to six years.

Our first priority is the construction of the North-South Rail Link (NSRL), connecting North and South Stations. The importance of this project is hard to overstate. The commuter rail links for the entire area are sundered by this one mile gap in the trackage. The time and effort required to traverse this gap makes it impractical for an individual living on the north side to take commuter rail to a job located on the south side or vice versa. The entire New England region is affected by this gap. Travelers from New York, Connecticut and Rhode Island with a destination to the north of Boston are inconvenienced by the gap. Ridership on the Northeaster to Portland, Maine has exceeded expectations. There is a need to connect this line with the lines from the south.

In addition, with the opening of the Greenbush line, the storage capacity at South Station will be saturated. Indeed, if any other commuter rail projects are built, such as the Fall River/New Bedford line, there will be need for additional train platforms at South Station. We realize that this project will have a considerable lead time and will require several years of engineering. What is critical at the present time is to preserve the right of way. As development proceeds in downtown, waterfront, and Back Bay areas, the construction of large buildings will mean that pilings are driven into the ground. There is now only a single, feasible right of way (ROW). If there is but a single piling for a major building driven into this right of way, the connector will be forever foreclosed. We are especially concerned about pilings that are driven in at an angle, which could inadvertently impinge on the ROW. Accordingly, we urge the MBTA to support the legislation at the State House to protect this right of way, to allocate funding to begin the engineering studies that will formally define the ROW, and to purchase any critical parcels or development easements as may be needed.

To reiterate, the Rail Link will dramatically improve mobility, air quality, the efficiency of the MBTA commuter rail network, and will extend the Northeast Corridor north of Boston for improved intercity rail transport. This is a vital, strategic project, not only for Boston, not only

for Massachusetts – it is critical for the entire Boston-centric Megaregion and Boston’s continued prominence our important Megaregion.

APT’s second priority is that the MBTA should comply with the agreed upon Big Dig mitigation projects: the Red Line /Blue Line connector at Charles; Arborway trolley service restoration on the E Branch of the Green Line, and the westward Green Line extension to Medford and Somerville. We are aware that an agreement has been made to study the Red/Blue connector as well as the Green Line to Somerville, but we are not convinced that the T has a real commitment to either of these projects. Accordingly, we urge that they be entered into the Program for Mass Transportation. As for the Arborway trolley service, there has been a lot of foot dragging as well as wringing of hands about the difficulty of providing handicapped access on the narrow part of Center Street. Unfortunately, this objection rings hollow coming from an agency that has historically shown disregard for the needs of handicapped riders. These three programs were agreed to by the MBTA prior to the beginning of the Big Dig, which is now completed, but there has been little or no movement on these. If the T can disregard a contractual agreement made with a private law firm, then how can we rely on any statement that the agency makes to anyone about any future project? The fact that the commitments were made by a prior administration is no reason for a failure to live up to them.

We also urge that the T finally make it a priority to extend the Blue Line to Lynn. There is no other project, save perhaps the previously mentioned Green Line to Somerville/Medford, that will generate as much new ridership. This project has sat in limbo for many years while expensive commuter rail projects, such as the Greenbush line, are given priority. The cost of the Blue Line extension is a fraction of a commuter rail extension and the ridership gain is much greater.

APT is in favor of extending the commuter rail system to Nashua, New Hampshire. There is already right-of-way and the track available. The project would require an interstate compact, but New Hampshire has expressed interest in this project and is actively working on it.

Finally APT is firmly in favor of real Washington Street replacement service in the form of light rail, and is firmly, *repeat firmly*, opposed to the Silver Line phase III tunnel. The so-called Silver Line is touted as Bus Rapid Transit (BRT). It is not rapid, it is not transit, and it does not deserve to be called an anything “Line.” It is no more a “Line” than the Number 1 bus route. The Silver Line buses run on streets in competition with traffic and the quote “Right of Way” unquote is anything but, as vehicles routinely block it. There are designated stops just as there are for any other bus line. A true rapid transit line is one that has a separated right of way and prepayment stations. The Silver Line has neither of these. It is a bus. The designation “Silver Line” is propaganda, a bait-and-switch travesty move to make it sound like a companion of the Red Line or one of the other existing lines. The only accurate part of the phrase Bus Rapid Transit is the word bus.

Accordingly, APT is adamantly opposed, as are the residents of the area, to the expenditure of a billion dollars on an unneeded, unwanted, and destructive tunnel beneath the Boston Common to connect the Washington Street Silver **Bus** Line to South Station. There is an existing, currently unused, portal connecting to the Green Line subway tunnel in Boylston station. If light rail service were instituted on Washington Street to Dudley Square – as was implicitly promised in

the Boston Transportation Planning Review – it would provide the needed, quality Orange Line El replacement service for the residents of Dorchester and Roxbury. This solution would then connect them directly with the downtown subway distribution system and the jobs in that area. This solution is precisely what these commuters have requested for over 20 years, versus than the present plan to connect them to the Silver Bus Line to the airport.

Finally, APT would like to comment on an area that is not directly under MBTA purview, but it is an area where the MBTA can have a significant impact. The area to which I am referring is freight, specifically rail freight. APT considers it vitally important that rail freight operations remain a viable option in the Commonwealth, and that the MBTA take whatever measures are necessary to ensure the only Class I freight railroad in Massachusetts, CSX, maintains its presence. We understand that the MBTA is currently negotiating with CSX on usage rights for tracks that will be required for several proposed passenger rail projects. We support this, but under the caveat that CSX also continue to operate on the route. If this co-sharing arrangement necessitates double or triple tracking to maintain schedules, than that additional capital expense should be comprehended in the total project cost. Should rail freight be cut back in Greater Boston, the impact would immediately be seen by an order of magnitude increase in the number of large trucks on the already congested highways and secondary roads of the Commonwealth

I wish to emphasize that APT is interested in working to help the MBTA reach these goals. As the only public transit agency in the Boston Metropolitan area, the T is of utmost importance. Our priorities have been arrived at after considerable time and deliberation, and we ask that the T give them due consideration.

Respectfully Submitted,

Ernest V. Loewenstein
Vice President
Association for Public Transportation