



Secretary Daniel A. Grabauskas
Executive Office of Transportation
10 Park Plaza, Suite 3170
Boston, MA 02116

Secretary Daniel A. Grabauskas, Chair
Boston Region MPO
Executive Office of Transportation
10 Park Plaza, Suite 3170
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Commissioner Robert W. Golledge, Jr.
Department of Environmental Protection
One Winter Street
Boston, MA 02108

Dennis DiZoglio, Chair
Boston Region MPO TPPC
10 Park Plaza, Suite 2150
Boston, MA 02116

January 13, 2005

Re: Reevaluation of Central Artery State Implementation Plan Commitments

Dear Secretary Grabauskas, Secretary Golledge, and Mr. DiZoglio:

The Regional Transportation Advisory Council (“Advisory Council”) is an independent group of citizens and officials federally charged with providing public input on transportation planning to the Boston Region Metropolitan Planning Organization (MPO). The Advisory Council provides a forum for broad-based and robust discussions of transportation issues and planning, including programming of federal transportation funding for the region, and is a main avenue for public participation in the planning process. At its meeting on January 13, 2005, the Advisory Council discussed the proposed reevaluation process and voted unanimously to submit the following comments to the leaders of the Boston Region MPO and to the state officials initiating this process.

All three projects under discussion are in the MPO’s Regional Transportation Plan (RTP). The MPO is clearly intended to consent to the results of this process by amending its RTP, and therefore the Advisory Council intends to take an active role in its reevaluation in order to provide its input to what is requested of the MPO.

The Advisory Council strongly supports:

- Restoration of the Arborway Line with light rail;
- Extension of the Green Line to Somerville and Medford as a light rail system;
- Finding and implementing an effective and cost-efficient means of connecting the Blue Line and the Red Line.

Providing transportation policy advice to the Boston Region Metropolitan Planning Organization

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The Advisory Council also supports the need for the state – not the Boston Region MPO or the MBTA – to find a source of funding for timely planning, design, construction and operation of these three projects. A state that can find a way to fund a \$15 billion roadway surely can find a way to fund these three projects.

The Advisory Council offers the following additional comments on the proposed process:

1. The proposed process raises Environmental Justice (EJ) concerns. As currently proposed, it singles out projects with EJ benefits after other projects that benefit non-EJ communities have begun.
2. Advisory Council members have expressed a concern that the process of evaluating projects is biased against fixed-guideway transit, exhibiting an indifference to the fact that people are simply more likely to use such a system than a bus; indifference to the fact that dedicated right-of-way systems are more likely to keep to a fixed schedule than mixed-traffic systems; and other factors that are inherent in the current generation of travel demand models.
3. If this process is to be conducted, there should be no change to the current substitution criteria, which state that projects can only be changed if the proposed project is infeasible. This is the rule that has governed the other 23 projects completed to date, and should not be changed for the final three.
4. If this criterion is to be changed, there should be special consideration given to the general transportation corridor that is slated to benefit for each project (i.e. Blue Line and Red Line riders for the Red/Blue connector; Jamaica Plain for the Arborway; and East Cambridge, Somerville and Medford for the Green Line.)
5. The Advisory Council must play an active role in this process, not only in terms of being kept informed, but also in terms of providing advice and guidance as this process affects the MPO.
6. The process must be kept fully public. At the moment, there isn't any information regarding this process on the state's web site, and there is no publicly available document describing the process. All hearings and information sessions should be provided when typical working people can attend them - that is, in the evening or on weekends, not just on weekday afternoons.
7. While this process is underway, it is important for the planning for the existing commitments to continue- this planning process informs the reevaluation process and also ensures that, should these projects be the ones that emerge from the reevaluation, they are on target for completion by or near the appropriate deadlines. Advisory Council members are concerned that, in order to meet clean air targets, projects not only go forward, but they go forward in a timely manner. Every year a project is delayed creates additional pollution in the region.

Note that the Advisory Council is not taking a position on the relative merits of the projects currently committed or possible substitutions. While there are many worthy projects under discussion as part of this process, such as the Blue Line extension to Lynn, the position of the Advisory Council is that these projects should be considered on their own merits, rather than pitted against the transit projects to which the state committed as part of the Central Artery. The Advisory Council would rather see time for the reevaluation process spent on meeting the deadlines for these proposed commitments.

Thank you for the opportunity to comment on this process. If you need to contact me, I can be reached at 617-730-2128 or Jeff_Levine@town.brookline.ma.us.

Sincerely,



Jeff Levine
Chair

cc: Advisory Council members
MPO members
Doug Foy, Office of Commonwealth Development
Federal Transit Administration
Federal Highway Administration
Joint Transportation Committee members