



Massachusetts Chapter

February 13, 2007

Mr. Kenneth S. Miller, P.E.
Executive Director
Executive Office of Transportation
Office of Transportation Planning
10 Park Plaza, Room 4150
Boston, MA 02116

Re: Proposed Amendments to 310 CMT 7.36
Central Artery State Implementation Plan
Mitigation Transit Commitments

The Massachusetts Chapter of the Sierra Club strongly supports the remaining Air Quality Mitigation Transit Commitments, which the Commonwealth had agreed to in 1991 as a condition for building the Central Artery/Tunnel Project. For those who live in the city and depend on public transportation every day, they remain as vital now as when they were first negotiated. We firmly believe that enlightened, responsible transportation policy, especially in a compact, congested urban area, should discourage use of the private automobile and encourage the utilization of more benign alternatives like transit, walking and bicycling.

However inadequate, the Commitments fit into this framework. Let me address their merits:

I am a longtime resident of Roxbury's Fort Hill neighborhood. While I live nearly a mile from the Arborway line, I ride its light rail vehicles and buses frequently, often averaging twice a week. I patronize many of the stores, restaurants and other businesses located along this corridor, in the commercial nodes at Symphony Hall, Brigham Circle, Hyde Square and Jamaica Plain Center.

Unfortunately, this has not been an easy trek, ever since the MBTA "temporarily" suspended service on the outer section of the E-Arborway in 1985, providing only buses between Heath Street and Forest Hills. The result is redundant bus service from Copley Square to Heath, allowing the Authority to cut the schedule of this light rail branch and use only single cars on off-hours while other branches are still running two-car trains, causing riders in the central subway to endure a long wait to board an already overcrowded car.

The MBTA keeps coming up with schemes to avoid restoring light rail that are almost guaranteed to make service even worse than it is already. In 2001 it proposed snaking a 60-foot bus through the most congested part of the Back Bay and around the Common to reach Park Street station. A year and a half ago it temporarily shelved plans for its "Silver Line" tunnel linking Washington Street with South Station, after public outrage boiled over at two public hearings in June. One of the tunnel options plopped its portal on Columbus Avenue right in front of a fire station, leading to suspicions that it also planned to run the Arborway bus in there. (No one seems to note the irony that while the current City administration continually highlights its opposition to

light rail restoration by citing the firehouse in Jamaica Plain—built over two decades ago when trolleys were still running on Centre Street—it has no apparent objection to a *portal* in front of the firehouse in Bay Village!)

Such bus proposals are fundamentally flawed, unnecessarily adding to downtown gridlock to produce a route that is redundant with an existing service for half its distance. Bunching and delays will only increase, further degrading the service and inducing yet more riders to "vote with their feet" and abandon public transportation altogether. It was such gridlock that led Boston to build its first subway a century ago. Why should we now be removing service from the subway and putting it back on the street? In the twenty years since streetcar service was suspended, daily ridership of the replacement #39 bus has declined from 28,000 to 14,400, a loss of nearly 50%. Despite MBTA claims that much of this ridership has moved to the Orange Line, its own statistics indicate that Orange Line ridership in Jamaica Plain has remained steady at roughly 23,000 riders since 1987. If Arborway rail restoration is formally abandoned, we have no guarantee that the MBTA will not further degrade the bus service, cutting its schedule or altering its route. In the past it has raised the possibility of diverting the in-town portion of the line from Copley Square to Ruggles station, and even splicing the remainder of the route into the #43-Tremont bus.

The Sierra Club also strongly supports the proposal for a Red Line-Blue Line connection from Bowdoin Square to Charles; perhaps we should consider extending it even farther to better serve the Back Bay. (In the absence of strategic planning by the state, however, I would note that the two lines could now be connected very quickly and inexpensively by constructing a pedestrian passageway between State and Downtown Crossing stations, which could also provide a direct connection into the former Woolworth's building and the new 33 Arch Street high-rise.) The Authority alleges that the new "Silver Line" bus from South Station to the Airport obviates the need for the link underneath Cambridge Street; however, this bus is of *no* use to people who live or work in East Boston or Revere and want to reach the Red Line or destinations like Mass General Hospital. If the Blue Line is ever extended in the other direction from Wonderland to Lynn, the lack of this short but vital link will be even more glaring.

The logic of extending the Green Line in the other direction, from Lechmere into East Somerville and Medford, is equally as compelling, as is the need for upgrading the Fairmount commuter line through Dorchester and Mattapan into the "Indigo Line." Several underutilized rail corridors, used only by the occasional commuter train, bisect these large swaths of Greater Boston—but provide little benefit for the people who live in the host communities. There is absolutely *no* excuse why such high-density, transit-dependent neighborhoods should not enjoy first class rail service into downtown, but instead are forced to depend on unreliable, jerky buses.

While the Club is happy that the state has finally committed itself to upgrading both corridors to high-volume transit service, it is highly unfair to everyone to advance the Indigo Line as a "substitution" for both Arborway restoration and the Red-Blue connector. All of the corridors in question serve discrete communities; it is absurd to contend that any one of these proposed projects could substitute for another. And a proposed revision to the plans for the Indigo Line that would divert it from a downtown terminal at South Station, out to Allston, makes no sense in terms of real-life transit origins and destinations—it is as illogical as the planners' insistent belief that people in Roxbury really want to ride the "Silver Line" all the way to the Airport, instead of into downtown.

In other words, the state is setting us up, trying to divide and conquer by playing Fairmount off against Arborway—Dorchester versus Jamaica Plain—to excuse its failure to plan for needed public transportation improvements throughout the entire MBTA system. They have defined this as a zero-sum game. We reject their framing of the issue and are forthright in arguing that all projects must go forward: Arborway restoration, Green Line to Somerville and Medford, Blue Line to the Red, and the Indigo Line.

After lavishing over \$14B on the Central Artery project, it is interesting to hear the state plead poverty in an attempt to wiggle out of its 1991 Commitments—and it is worth noting that there is no funding yet committed for the projects here that it does plan to build. Yet it is willing to risk bankruptcy and squander a billion or more on a circuitous “Silver Line” bus tunnel skirting the far southern periphery of Downtown, which will not take the riders along either leg of this misbegotten “line” where they want to go—or is even desired by the neighborhoods that it would purportedly “serve.” And *no one* in Chinatown, Bay Village, Back Bay or the South End wants to host the tunnel portal.

Financial responsibility begins at home by serving people’s *real* needs, not by building a profligate boondoggle like the “Silver Line” bus tunnel. The MBTA’s protestations of inadequate funding are actually a judgment that it views those of us living in the inner city, who depend on its services every day—its “captive audience,” so to speak—as second-class citizens. Do your duty as a public servant. The Central Artery Mitigation Transit Commitments must stand.

Respectfully submitted,

John Kyper, Transportation Chair
Sierra Club, Massachusetts Chapter