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Mr. Bernard Cohen
Transportation Secretary
Commonwealth of Massachusetts
10 Park Plaza; Suite 2150
Boston, MA 02116

Dear Secretary Cohen:

The Association for Public Transportation welcomes the opportunity to make final comments on the draft *Journey to 2030: Transportation Plan of the Boston Region Metropolitan Planning Organization*. First of all, we acknowledge the difficult job undertaken by the MPO prioritizing and choosing from so many valuable and necessary projects. And while we certainly would like to see more transit oriented projects chosen, we appreciate the necessity of the highway projects chosen.

However, APT is very disappointed that one of the highest rated projects in the entire document, the North South Rail Link (NSRL), was not included. This project, by connecting North and South Stations in Boston 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 Mega-region and Boston's continued prominence in this Mega-region. APT is very concerned that the invaluable Right-of-Way (ROW) for the NSRL is in serious danger of being encroached upon by development projects along the entire ROW. It will only take one encroachment to render the entire project technically infeasible. It is imperative that this project be included in the Journey to 2030 Transportation Plan and that the ROW be preserved immediately.

APT does have several issues with some of the transit project chosen, the common thread being the use of Bus Rapid Transit (BRT). The current experience of the Silver Line, a BRT line, highlights the issues with BRT. BRT is simply not an effective means of transporting commuters quickly, effectively, and reliably in the congestion prevalent in the Greater Boston area. Current users of the Washington Street portion of the Silver Line are very dissatisfied with the performance of the buses, and are clamoring for a light rail solution that would utilize the existing Green Line portal near Boylston Street. APT supports this modification, and would therefore be against the \$700 million dollar tunnel to connect the Silver Line. These funds could be better spent elsewhere.

Similarly, APT has very serious reservations with the current alternatives for the Urban Ring. The biggest concern is with respect to budget numbers – there are none for the four alternatives given. While the project does have merit, APT is of the opinion that only a light or heavy rail solution in a dedicated ROW will offer the performance and utilization that is touted in the justification for the project. The Urban Ring is strategic project for the region, though frankly not quite as strategic as the NSRL. But to evaluate this project financially, all parties need the true costs of all the alternatives, as well as the ridership comparisons, and also the proposed travel schedule. As an example, it was easy to determine that Alternative One would be a non-starter anytime the Boston Red Sox had a game during rush hour. The buses would be surrounded by grid-locked traffic, unlike the subway which would continue to move, effectively, in its dedicated ROW underground.

APT further recommends that Greater Boston look to other regions which have evaluated BRT and decided that it is not a viable solution for their region. Denver and Charlotte come to mind immediately. The FTA permits regions to select a Local Preferred Alternative (LPA) for transportation modes. Greater Boston should immediately remove BRT as an LPA and substitute Light Rail. For this reason, APT strongly recommends that the Urban Ring Phase II be removed from the Transportation Plan. We submit that the NSRL would be a far better choice.

APT supports the completion of the transit mitigation commitments for the Big Dig, including the Arborway E branch of the Green Line, the extension to Somerville/West Medford and the Blue Line Red Line Connector at Charles St. APT also supports the Blue Line extension to Lynn and the commuter rail project to the South Coast (Fall River / New Bedford) through the Stoughton branch.

APT considers it vitally important that rail freight operations remain a viable option in the Commonwealth, and that it take whatever measures are necessary to ensure the only Class I freight railroad in Massachusetts, CSX, maintains its presence. Critical projects here are double stacking initiatives and ensuring that the only multi-modal rail yard in Boston, the Beacon Yard in Alston', remain operational. There are concerns that Harvard University's plans for its Boston campus may jeopardize the viability of the yard. Should this rail yard be forced to close, the impact would immediately be seen by a order of magnitude increase in the number of large trucks on the already congested highways and secondary roads of the Commonwealth.

Also, APT was surprised that there was limited reference in *Journey to 2030* about the use of the Port of Boston. There are initiatives on-going to utilize the sea as another highway for freight with a program known as Short Sea Shipping. This could be an important way to reduce congestion on both the highways and freight railways. This program would be even more effective with freight rail access to the Boston seaports.

Lastly, APT must comment that there needs to be some outside-the-box thinking with respect to transportation project funding. The Commonwealth has built a very expensive road network. The operating costs of this network are likewise expensive. To maintain a state of good repair, there will need to be additional revenues. Other regions are using HOV/HOT (high occupancy toll) with success.

On the transit side, APT would like to see the EOT and MBTA explore areas where development of valuable T properties can result in a predictable revenue stream for the MBTA. The proposed North South Rail Link is a project that is especially well suited for such an initiative, with two (or three) magnet rail stations.

Thank you for the opportunity to comment. APT looks forward to seeing to the final version of *Journey to 2030*.

Best regards,



Richard J. Arena

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