

Green Line Advisory Group for Medford (GLAM)  
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November 14, 2010

Katherine Fichter  
Executive Office of Transportation  
Office of Transportation Planning  
Room 4150  
Ten Park Plaza  
Boston, Mass. 02116

Dear Ms. Fichter:

Based upon the Station Design Work Group meeting of November 8, 2010, we are responding to the Group's request for public comments regarding the Design principles developed by the Station Design Work Group subcommittee.

When looking at the concept of Design principles, we would like to share that it would be helpful for the public to know what the MBTA is required to do legally under the law when designing stations and what the reality of their funding constraints are (i.e. the Americans with Disabilities Act, mitigation impact to abutters and small businesses along with funding requirements, project timeline constraints, etc.). The Station Design Work group should be aware of what limitations the Mass DOT has set as parameters.

Although we can appreciate the work that went into the preparation and discussion of the draft spreadsheet, this draft itself as presented at the meeting doesn't seem to grasp our and the academic understanding of philosophical principles according to the theory of principles. The principle of sufficient reason does not jump out at us readily. It would be helpful if a more comprehensive and fundamental doctrine or assumption was defined for each category area before this document is finalized. We would suggest that the Station Design Workshop group consider a more compelling point of view that is fully explicable and one that clearly includes social justice design principles that focus on equitable sustainability goals, which is one of the original goals for this project. The spreadsheet instead seems to be more a wish list of desires.

For example, the heading of Local Hiring, although admirable, is stated in passive rhetoric and does not establish clear social equitable and sustainable goals based in continued economic regeneration. We would suggest more active goals derived from one main principle.

For Example:

Sustainable Economic Job Opportunities
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(Principle) -Ensure fair access to quality jobs, workforce development, and contracting opportunities in the building of the Green Line Transit project <sup>1</sup>
1) Establish and uphold job quality protections and standards, including prevailing wages and benefits, within the planning, design and construction of the Green Line Transit project.
2) Provide resources for affordable job training and career pathways for all people, including the environmental justice and disability communities, to access employment opportunities associated with manufacturing, building, maintaining, and repairing the Green Line transportation system.
3) Strengthen, enforce, and tie both state and federal funding to compliance with contracting goals for disadvantaged business enterprise, in order to ensure supplier and industry diversity within the Green Line transit project. Develop an Affirmative Action Market Plan regarding how the state will attract diverse vendors through its bidding process in various stages of the project.

The Americans with Disabilities Act (ADA) is not only an architectural requirement. It is a civil rights law. This is a critical point often neglected by designers, planners and architects. Therefore, we believe the ADA should have its own design category and its own set of principles. The ADA should not be buried under the category of architecture. In doing so you are neglecting and continuing an attitude of neglect at the MBTA regarding people with disabilities instead of encouraging members of its core ridership to participate. The Station Design Workshop Group should refer to the Congressional Mandate to the Supreme Court of the United States. The mandate of the ADA is for the disability community to have maximum participation in all areas, which is the ADA intent.

We provide a short list that should not be considered as inclusive of all the needs of people with disabilities, but as an example.

American with Disabilities Act (ADA)
(Principle) Building maximum, superior accessibility for people with disabilities that provides a general spirit of welcoming and inclusiveness in public transportation.
1) Provide accessible transportation from point of origin to the final destination.
2) Seek additional federal funds from New Freedom’s Initiative to go beyond the ADA to provide superior accessibility.
3) Include all ADA standards, including new, updated standards, in all design patterns that remove obstacles, both physical and regarding community participation in the proposed Green Line project : a) station design, transit links, bus shelters, surfaces, signs, communication access, parking (both the ride and self parking), community meetings to name a few.
4) Develop an emergency evacuation plan for people with disabilities at all stations that includes an ADA attendant at each station.

<sup>1</sup> Based upon guiding equitable principles as developed by the Equity Caucus at Transportation for America

Again, these are just a few examples of active goals under the ADA that derive from its core principle.

We also believe the design principle worksheet should include principles and goals that are more inclusive toward the whole community which includes the elderly, environmental justice and small business community, as well as, the disability community as mentioned above. The worksheet itself seems to focus more on those who are all ready known to take public transportation (i.e. bike riders and a more able bodied population) as opposed to attracting a more inclusive population who do not always find public transportation a welcoming environment, yet are more fully dependent upon it. If this transit project is to be economically sustainable, it must focus on its core ridership, identified in many academic reports on public transportation as people with disabilities, the environmental justice populations and the low income. This core ridership is identified in academic studies such as conducted by the Brookings Institution Center on Urban and Metropolitan Policy and the recent Northeastern University Study on maintaining diversity in transit-rich neighborhoods. These reports call for the full participation of these core populations.

This is a moral dilemma faced by the subcommittee since its membership is less diverse than the community as a whole. Even though you have a member with a disability who works for the MBTA, there is no self identified environmental justice person, elderly person or small business representative that sits on the group who could provide a different, authentic perspective in regard to their transit design needs. It is therefore interesting that a champion for Tufts University sits on the Design Work Group, who will derive the biggest benefit from the project, but the environmental justice community, the elderly and small business owners are left out of participation.

Unfortunately, the general public, the disability and environmental justice communities, have only been given a week to comment upon design principles released only within the last week while the subcommittee itself has been working on them since September. That is why GLAM has formally requested that the Design Group and any and all subcommittees adhere to the new open public meeting laws that all minutes/notes and accompanying documentation be posted within the ten business day requirement.

Therefore, there is much more we could convey if time would allow. But we will suffice it to say that the station design worksheet must be more coherent around core principles and social equity. Other wise, it appears to be a wish list of many agendas that are not addressing the service needs of the disability community, the environmental justice populations, the elderly and the small business community. We also suggest that the design principle spreadsheet correlate with the MBTA's legal requirements and fiscal constraints so both the Design Workshop Group and the community do not eventually feel they are being led down the garden path.

Sincerely yours,

Carolyn Rosen  
Chairperson GLAM