

July 28, 2009

Secretary Ian Bowles  
Attn: MEPA Office  
Re: EEA No. 6826/11707  
100 Cambridge Street, Suite 900  
Boston, MA 02114

RE: Comments on the Environmental Notification Form for the  
Silver Line to South Station Bus Enhancement Project  
EOEA #6826/11707

Dear Secretary Bowles:

LivableStreets Alliance would like to take this opportunity to comment on the proposed new direct surface route connecting existing Silver Line service on Washington Street to/from South Station.

We are pleased to learn that the MBTA has an interest in using surface streets to bring about this important new branch to Silver Line operations. We understand that the idea of such a surface street connection dates back at least to October 2006, when the Washington Gateway Main Street (WGMS) specifically requested this connection be explored while commenting on the so-called Phase III NPC and its more “long-term” solution providing this link via an underground tunnel. WGMS requested this link as a way to quickly institute service on an “Interim” basis until the long-term Phase III tunnel could be made operational some 5 to 10 years later.

In reviewing documents provided to us by WGMS , EOT, and the MBTA, and from discussions we had with officials from all three organizations, it appears that:

1. The October 2006 “Interim” proposal made by WGMS contained a specific suggested routing that utilized new Frontage Road and Albany Street to connect existing Silver Line service on Washington Street to/from South Station. This routing was specifically suggested in order to avoid most traffic congestion that exists in the South Station, Dewey Square, and Kneeland Street areas.
2. That WGMS never heard back from the MBTA on either the “Interim” surface connection nor their specific proposed routing.
3. That the MBTA announced in May 2009 that it would use Federal stimulus funding to pay for a new Silver Line link to South Station, using Essex Street, Dewey Square, and Kneeland Streets as the route to/from South Station.

After studying this historical record, and studying the subject NPC, we have several concerns with the process and substance of what the MBTA now proposes. We also have suggestions to resolve most of these concerns that we request the MEPA office require the MBTA to either study or include in their final plans. These concerns and recommended solutions include:

1. A Complete Street serving Transit Riders to/from South Station Using the Speediest Route Possible.

- a. Concern: The MBTA's proposed routing is via Essex Street, Dewey Square (intersection of Summer Street/Atlantic Avenue near South Station), Surface Road, and Kneeland Street. An expeditious bus-only lane (labeled "Bus Only Lane" in the NPC) would be provided for a short stretch of Essex Street only, less than 25% (approximate) the length of the total proposed route; buses would use general traffic (and congested) lanes for the remaining 75% (approximate) of the total route (labeled "Shared Bus Lane" in the NPC). See NPC drawing attachment, "Bus Only Lane Option", unnumbered, dated 3/26/09.

Existing Silver Line riders heading Inbound (to Downtown) are very aware that operations on Washington Street typically bog down north of Herald Street and/or Stuart Street (Kneeland Street). The MBTA's proposed connection to South Station would unfortunately maintain use of these congested portions of Washington Street, and add several new heavily congested portions of surface roadways in the Dewey Square and Kneeland Street areas.

**The NPC contains no traffic analysis or documentation to either support the MBTA's selected route or show any evidence that an Alternatives (routing) Analysis had been undertaken. Further, the NPC contains no timeline or other projections as to when the MBTA now expects the so-called Phase III tunnel to be made operational, and thus the duration proposed for the NPC's surface routing to/from South Station.**

- b. Proposed Solution: MEPA should determine that the proposed project requires the preparation of an Environmental Impact Report (EIR). The EIR should include:
- i. Alternatives Analysis: The EIR should include an evaluation of all feasible alternative routings via surface streets to connect existing Silver Line service on Washington Street to/from the South Station area. The alternatives analysis should include a clear comparison, including quantified traffic study including signalized levels of service, queue lengths, and travel time durations, as suggested immediately below, for each alternative including the Frontage Road/Albany Street routing

proposed by WGMS in 2006. The EIR should provide a detailed rationale to explain why certain surface street routings were selected and others ruled out for further consideration.

- ii. Levels-of-Service Analysis: The EIR should include an updated Levels-of-Service (LOS) analysis for all signalized roadway intersections located within the proposed project area, including optional routings considered in the Alternatives Analysis for the morning and evening rush-hour periods post-construction. The EIR should include the average and 95<sup>th</sup> percentile vehicle queues for each intersection within the project and alternatives areas. It should also analyze weave and merge operations on major surface streets such as Essex Street at Atlantic Avenue, Dewey Square at Atlantic Avenue, Dewey Square at Summer Street, and Kneeland Street at both Harrison Avenue and Washington Street.
- iii. Real Traffic Signal Prioritization. The EIR should include a detailed study of how the new route to/from South Station, and how the existing Washington Street routes, can best benefit from “real” traffic signal prioritization. Since 2002, existing Silver Line service has not lived up to it’s billing as bus “rapid transit” in major part because buses have to queue and await for a green traffic signal at one of over a dozen traffic signals along the route. The EIR should include specific proposals, including takeover by the MBTA of the bus lane care and custody from the City of Boston, for how “real” traffic signal priority can be provided both on the new route to South Station and on the existing Washington Street route. MBTA and City of Boston officials often state that traffic signal priority does exist. However, when asked, they acknowledge that such priority kicks-in only when buses are more than 15 minutes behind schedule. But how do the traffic signals find out if the buses are behind schedule? Why do buses always seem to be waiting at red lights? And why can’t buses both on the new South Station and existing Washington Street routes be given an unequivocal green light at each signal to speed up service and bring “rapid transit” to the Silver Line?

Concurrent with development of this NPC, the MBTA has been holding public meetings in Mattapan regarding a new Silver Line route dubbed “28X” providing bus rapid transit from Mattapan to Dudley Square. As part of those meetings, the MBTA appears to commit to ensuring that “real-time” signal prioritization will be part of the 28X plans. The EIR should require the MBTA to evaluate and/or commit to providing similar real-time signal prioritization for the new South Station and existing Silver Line service on Washington Street.

- iv. Off-Board Fare Machines. The NPC states that off-board fare machines will be provided at just the new station on Essex Street only. Existing Silver Line users know full well that the delays caused by on-board fare collection machines are considerable. The EIR should require that off-board fare machines be evaluated for each new station along the proposed South Station route, and for each station along the existing Washington Street route. Those existing stations each have a large four-sided kiosk that also contains both electric and telephone service needed to implement off-board fare machines. The EIR should include a discussion of these existing services and their ability to hasten implementation of off-board fare machines and/or collection.

The MBTA has also recently held public meetings in Mattapan regarding a new Silver Line route dubbed “28X” providing bus rapid transit from Mattapan to Dudley Square. As part of those meetings, the MBTA appears to commit to ensuring that such off-board fare machines and collection will be part of the 28X plans. The EIR should require the MBTA to evaluate and/or commit to providing similar off-board fare machines for the new South Station and existing Silver Line service on Washington Street.

- v. Project Duration. The EIR should include a current best-effort timeline or other projection as to when the MBTA now expects the so-called Phase III tunnel to be made operational so that the duration proposed for the NPC’s surface routing to/from South Station can be ascertained.

## 2. A Complete Street serving Pedestrians.

- a. Concern: The MBTA’s existing Silver Line services runs on Washington Street between Dudley Square and Temple Place. At nearly a dozen separate crosswalks across Washington Street, pedestrians face three kinds of unacceptable safety problems. See “Silverline Bus, Needed Reconstruction Work on Washington Street, emailed to MEPA under separate cover”. First, crosswalks built by the MBTA in 2001/2002 with specialty brick materials have in each instance been broken and/or collapsed by the constant pounding of very heavy Silver Line tandem buses. To date, the MBTA has refused to accept responsibility for the upkeep and maintenance of these crosswalks, stating the City of Boston—not the MBTA—retained ownership and responsibility for funding of their repair. Second, some half-dozen crosswalks were installed by the MBTA back in 2002 using standard thermoplastic markings and absent traffic signals in each case. These marking do not match the color and look of the specialty crosswalks, and cause motorists that traverse the length of Washington Street to be confused as to when a cross-walk exists and appears not to exist. Third,

some of these 2002 un-signalized crosswalks are very unsafe to traverse as vehicles speed down Washington Street.

- b. Proposed Solution: The EIR should require that the MBTA evaluate alternative ownership models in which Bus Rapid Transit (BRT) Systems, whether it be new links to South Station or existing routes on Washington Street, treat the roadway surfaces (including cross-walks) as part and parcel of the BRT system, and not as some separate and distinct orphan to be treated with a hands-off approach. The EIR should also require the MBTA to evaluate how to best repair and/or replace both the existing deteriorated specialty cross-walks and thermoplastic ones such that durable and uniform cross-walks are available to both pedestrians and drivers alike. Third, the EIR should require the MBTA to evaluate the feasibility of installation new traffic signals on Washington Street at: (i) Peter's Park; (ii) Waltham Street; and (iii) West/East Concord Street.

### 3. A Complete Street serving Bicyclists.

- a. Concern: The NPC contains no discussion of bicyclists and their ability to utilize the entirety or portions of the new bus route to/from South Station. Originally, bicyclists were not allowed to travel in the exclusive Bus Lane on Washington Street when it commenced operations in 2002. In 2008, the City of Boston and MBTA deserve credit for opening up—with one exception (see immediately below)—use of this Bus Lane by bicyclists. Finally, the existing paving at portions of Washington Street has completely failed, creating deep ruts and/or tall protrusions. See “Silverline Bus, Needed Reconstruction Work on Washington Street, emailed to MEPA under separate cover”. These pavements undulations are completely unacceptable, especially to bicyclists among other roadway users.
- b. Proposed Solution: The EIR should require that the MBTA consider providing supplementary support for bicyclists in each of the routes that are part of the Alternatives Analysis. Bicyclists deserve equal treatment and analysis for any proposed and new route to/from South Station. Further, the EIR should require that the MBTA consider allowing bicyclists to legally travel in the contra-flow portion of the existing bus route on Washington Street between Marginal Road and Berkeley Street. Presently, bicyclists are not legally allowed to traverse this key three-block section of Washington Street. The EIR should require the MBTA to evaluate solutions to this existing problem. Lastly, the EIR should require that the MBTA address the need to fund and implement repairs to those portions of the existing Washington Street roadway which have unacceptable pavement undulations.

Thank you for considering our ideas and suggestions to require that the MBTA undertake an EIR as the most appropriate MEPA response to this Silver Line NPC. We trust that both MEPA and the MBTA desire to help implement a "Complete Streets" solution that works best for existing Transit users on Washington Street and those taking a new interim, direct surface route to/from South Station, pedestrians (presumably many of which are also Transit users) who need to traverse Washington Street, and bicyclists who wish to safely traverse the entirety of the existing Silver Line corridor and new route to/from South Station. If you have any further questions about our comments, please contact Glen Berkowitz of LivableStreets Alliance. Glen can be reached at 617-352-0000 and [glen@livablestreets.info](mailto:glen@livablestreets.info).

Sincerely,



Glen Berkowitz, Board of Directors, LivableStreets Alliance

James Aloisi, Secretary, Executive Office of Transportation  
Aaron Michlewitz, State Representative, Mass. House of Representative  
Stephen Woelfel, Director of Strategic Planning, Executive Office of Transportation  
James Folk, Director of Operations, MBTA  
Erik Scheier, Mass. Bay Transportation Authority  
Vineet Gupta, Director of Planning & Policy, Boston Transportation Dept.  
Tabitha Bennett, Mayors Office of Neighborhood Services, City of Boston  
Nicole Freedman, Director, Boston Bikes, City of Boston  
Guy Busa, President, Board of Directors, Washington Gateway Main Streets  
George Stergios, President, Worcester Square Area Neighborhood Association