



Massachusetts Chapter

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Secretary Ellen Roy Herzfelder.  
EOEA, Attn MEPA Office  
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Re: Silver Line Phase III Supplemental Draft Environmental Impact Statement/  
Supplemental Environmental Impact Report

The Massachusetts Chapter of the Sierra Club is opposed to the Phase III bus tunnel connection of the Silver Line as currently proposed, and urges that the No-Build Alternative be selected. We contend that Phase III is severely deficient and fatally flawed, in terms of both its construction impacts and upon the communities that it purports to serve. If built as proposed, it would constitute a massive waste of scarce public resources, providing—at best—limited transportation benefits for the riding public. Instead, we recommend that the MBTA amend its New Starts Application to redesign this project as an integral part of the city's light rail system, thereby better serving both the Roxbury and the South Boston Waterfront communities by taking their riders where they *really* want to go—not the figment of some planner's imagination concocted to justify federal funding.

It is time to dispense with the longstanding pretense that this proposal has anything to do with replacement service for the old Orange Line elevated that used to connect Roxbury and downtown. For several years the MBTA has proposed one portal option after another to link Washington Street service into the subway. Each has proven unacceptable to the adjacent communities. First, it would have claimed Chinatown's new YMCA; then Bay Village stood to lose Eliot Norton Park. The two portals now under consideration—New England Medical Center (with the “temporary” use of this Park for several years during the construction) and Columbus Avenue in front of a fire station—have also provoked much anger from those who would be most directly impacted by them. The convoluted routes of the tunnel segments that have been proposed to link Boylston station with the portals, and of the circuitous bus routing that would be needed to reach Columbus Avenue from Washington Street, would severely reduce the utility of the Silver Line for Roxbury residents. The MBTA now obliquely recognizes this reality by proposing to continue the aboveground bus service to Temple Place that was originally supposed to be abandoned once the tunnel had opened.

Chapter 1.0, “Purpose and Need,” claims that this new bus tunnel, including the Core Tunnel Segment from Boylston to South Station, would “provide direct and efficient connections to other major elements of the regional rapid transit system...thereby improving service and relieving demands on capacity (particularly on the Green Line).” It is hard to imagine how these benefits would be realized. One alignment would travel underneath Eliot Norton Park and Charles Street as far as

Boylston Street, where it would make a 300-degree turn to the right to bring it directly beneath the Green Line. A variation would squiggle the route under Stuart Street.

The formerly planned loop under Boston Common has been abandoned and the Tremont Street alignment is now proposed to turn to the left at Boylston, where it would join the tunnel from South Station in a double-decker configuration for the station platforms, with parallel passing lanes. Expensive provisions will likely be required to protect the historic Central Burying Ground on the Common and underpin the buildings located along Boylston Street. Buses from either direction would evidently traverse the station twice, punctuated by a turnaround at the intersection of Boylston and Charles extending to the gates of the Public Garden. This loop would enable these buses either to return to their point of origin, or continue onto the other leg of the route.

None of these routings would facilitate efficient operation, but Tremont Street would be the worst. Buses would traverse this length of tunnel twice, slowing down to reverse direction, which would inevitably result in frequent congestion, thereby impeding traffic flow. This design would seriously impact the capacity of the facility since vehicles would need to negotiate a cul-de-sac instead of traveling directly through the tunnel, aggravated by the reality that buses (unlike light rail vehicles) cannot be reversed or coupled into a train to increase capacity. And it replicates the poor routing of all its previous variations because it fails to provide a one-seat ride to either Roxbury residents wanting to go downtown, or conventioners bound for the Back Bay—forcing both sets of riders to cross each other's paths changing modes at Boylston to get where they really want to go, belying the MBTA's purported desire for efficient connections cited above.

During the past year the MBTA has introduced a new portal location on Columbus Avenue, between Arlington and Berkeley Streets. While providing a more direct route for tunnel operations, however, this proposal contains its own serious drawbacks. It would make no sense for Washington Street riders, forcing them through yet an even more circuitous detour to get into the subway, via Marginal Road and Berkeley Street—and, worse yet, returning from the tunnel by looping through two congested blocks of Berkeley and Stuart Streets to reach Arlington Street. The portal would take up half the width of Columbus, making it a one-way street on this block, and the buses would stop right in front of the fire station to raise and lower their trolley poles while shifting between electric and diesel propulsion.

The idea of extending the tunnel to Columbus suggests an additional, hidden agenda. For two decades the MBTA has attempted to abandon the outer end of the E-Arborway branch of the Green Line to Jamaica Plain, permanently replacing that service with buses. Four years ago, in response to the requirement that it replicate the original service to Park Street, it proposed running articulated buses on Boylston Street and around Boston Common, generating strong opposition from Back Bay businesses and Beacon Hill residents, who would suffer additional street congestion and air pollution. This tunnel would be an underhanded way of seeming to fulfill this requirement by putting the temporary replacement #39 bus into the subway, even though it still wouldn't quite get it to Park Street. Ironically, while the City of Boston has cited the fire station on Centre Street as a reason not to restore streetcar service to Jamaica Plain, it has no apparent objection to putting a portal in a location be far more likely to impact emergency operations.

This document does not mention the Arborway option, but it does name eight bus routes it proposes to run through the tunnel, including one through the congested Back Bay to the Hynes Convention center. Calculating from the headways of all these routes listed on page 3-24, there would be 74 buses per hour running through the Core Tunnel Segment between Silver Line Way and Boylston station! This is not a realistic scenario. Other evidence of poor planning is evident

in this document. Much of the tunnel would be located in Bay Village, which is built on landfill, and there is no plan here for dealing with water seepage into the tunnels. The T's normal practice of pumping the water into the sewage system has badly aggravated existing problems with the water tables in this area.

Under both the Charles and Columbus alignments, the turnaround at the corner of Boylston would be too small to be of much use, since it could only accommodate one or two buses. After proposing repeated portal options that it must know would be unacceptable to the abutting neighborhoods, one must wonder if the T has any intention at all of continuing the tunnel from South Station beyond Boylston? The positioning of the segment underneath and parallel to the existing Green Line suggests that it might easily convert it to light rail and switch the line into Arlington station—however, at a much greater cost than building the tunnel for rail in the first place, given the wider right of way, and the gentler grades and curves, that a bus tunnel would require. This document also envisions severing or destroying the abandoned streetcar tunnel under Tremont Street, which could be more efficiently utilized for Washington Street light rail service, at a fraction of the cost of what is proposed here.

Phase III of the Silver Line makes no sense. Linking Washington Street service with the South Boston Piers Transitway simply cannot serve well the populations along either end of this jury-rigged “line” because it will not take them where they want to go. Further, connecting its two legs with a convoluted bus tunnel that will require an awkward, time-consuming turnaround is a deficient design that can only produce an operational nightmare. Both of its disjointed segments would function better if they were integrated into the Green Line, and a portal at or near Marginal Road would serve the surrounding neighborhoods and institutions far better than the Authority's various proposals, without all the disruption those would entail.

This plan is a loser. Not only are all the Silver Line options presented thus far extremely wasteful of scarce public resources, but the MBTA is also wasting the public's time and money by repeatedly coming up with outrageous schemes it should have reason to know will be rejected. It is time for the EOEa to put an end to this tawdry charade, reject the Supplemental Draft EIS/EIR and compel the agency to come up with plans that will serve the needs of the *real* people who use the system, not a boondoggle to benefit its contractors and justified by a fictitious ridership that exists only in its planners' imagination.

Respectfully submitted,

John Kyper, Transportation Chair  
Sierra Club, Massachusetts Chapter