



Massachusetts Chapter

October 19, 2006

Secretary Robert Golledge
EOEA, Attn: MEPA Office
William Gage, EOEA No. 6826/11707
100 Cambridge Street, Suite 900
Boston, MA 02114

Re: **Silver Line Phase III
Notice of Project Change**

The Massachusetts Chapter of the Sierra Club remains strongly opposed to the Phase III bus tunnel connection of the Silver Line, including its most recent iteration as described in this Notice of Project Change. We urge the Secretary to reject this document. Despite the shifting of the bus portal to yet another location, Phase III remains a severely deficient and fatally flawed plan in terms of both its construction impacts upon abutters, and its dubious utility for 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 to the riding public.

Instead, we call upon the MBTA to amend its New Starts Application to redesign this project to make sense in terms of real-life origins and destinations, 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 out-of-touch planner's imagination concocted to justify federal funding. The Silver Line is a “shotgun marriage” of two unlinked transit projects that do not belong together and will not serve well the communities of interest along either leg of its serpentine route. They need to be de-coupled and reconfigured. Washington Street should be rail transit as originally planned, connecting its riders directly into downtown and to the rest of the subway system. Similarly, conventioners will be far more likely to want to travel to the Back Bay hotels, restaurants and other attractions than to the southern part of the city. The Authority needs to conduct an alternatives analysis for extending the Transitway from South Station to Boylston to determine the most appropriate way to tie it into the Green Line.

For several years, the MBTA has proposed one portal option after another to connect, finally, the Washington Street bus into the subway. Each has proven unacceptable, however, both to the adjacent neighborhoods and to the riders along this Corridor, who are still waiting for a real replacement service for the old Orange Line elevated that they lost two decades ago. Instead, abutters would face the unnecessary destruction of valuable community infrastructure, as well as years of construction disruption and lower groundwater levels imperiling their homes and businesses. As with all the previous tunnel schemes, transit riders would still be forced into a time-consuming detour around the southern periphery of downtown, forced to make an awkward transfer to get to where they really want to go. The current plan replicates all these deficiencies and poses no solution to anyone's needs.

The currently-proposed portal would be located at the corner of Tremont Street and Charles Street South. Buses would rise to the surface in front of the Mass Pike Towers apartment complex via a long, partly enclosed “boat section” ramp extending almost to the corner of Marginal Road, where the dual-mode buses would change from diesel to electric trolleybus propulsion, and vice-versa. Buses emerging from the tunnel would start their engines while on the ramp, adding to ambient noise and vibration levels and spewing diesel particulates into several crowded neighborhoods suffering some of the worst air quality in the entire metro-

politan region. By impeding pedestrian access, the wide boat section would also partially isolate the complex from Bay Village across Tremont Street, including its closest convenience store.

South of the portal buses would run in contra flow lanes on Marginal Road and Herald Street for the two blocks between Tremont and Washington, requiring that buses cross each other's paths at two locations and worsening the congestion on these parallel roadways connecting the Back Bay with the Central Artery. In order for the articulated 60-foot buses to make a hairpin turn from Tremont to Marginal, officials have considered demolishing a portion of the Mass Pike Towers complex, a move that would needlessly exacerbate the serious shortage of affordable housing in the urban core. As in previous portal proposals, the nineteenth century buildings of Bay Village would suffer the effects of massive excavation and groundwater depletion.

To build a multilevel transfer to the Green Line at Boylston station, the NPC proposes an open cut along $\frac{3}{4}$ of the block of Boylston Street between Tremont and Charles. Properties affected by the construction would include several Emerson College dormitory and classroom buildings, the Colonial Theatre, offices, stores and restaurants—not to mention Boston Common with its historic Central Burying Ground and a small Parks Department maintenance yard. All of these buildings and the cemetery would need to be secured to prevent any settling or structural damage caused by the shifting of the ground, much of it filled land. Over the past decade Emerson has spent millions of dollars to relocate its campus to this neighborhood, and it will not welcome the gratuitous disruption to its business that these plans would entail.

Last year's Supplemental Draft Environmental Impact Statement identified eight bus routes that would use this tunnel and their proposed headways, totaling 74 buses per hour on the Core Tunnel Segment between Silver Line Way and Boylston station—hardly a realistic scenario, especially given that the proposed turnaround underneath the corner of Boylston and Charles would be so small it could accommodate only one or two buses at a time. One proposed route would run through the most congested part of the Back Bay to reach the Hynes Convention Center. The NPC does not discuss whether all eight bus routes are still planned for the tunnel, or if any have been eliminated or added.

A year ago the MBTA withdrew its proposed portals at New England Medical Center and in front of the firehouse on Columbus Avenue. It then studied a portal location along Marginal Road beside the Turnpike, one that would be less intrusive to the community. It determined this location unfeasible, however, "primarily due to operational issues associated with the alignment geometry which consists of a 90 degree turn on a 100-foot radius curve over a 5% grade as the tunnel turned on to Marginal Road and ascended to the surface." This geometry would pose *no* problem for light rail vehicles, however, and a 1985 MBTA publication discussing options for Washington Street replacement service had proposed just such a portal there for a branch of the Green Line.

Epitomizing the pernicious nature of the T's Silver Line planning process, last year's SDEIS had proposed severing the abandoned streetcar tunnel under Tremont Street to build the Boylston transfer. Such an action would destroy the utility of a tunnel that could be more efficiently utilized for a Washington Street light rail service directly into Park Street, at a fraction of the cost of what is proposed here. Evidently, the Notice of Project Change would still have the MBTA squander this priceless urban resource to replace it with something far inferior.

This plan is a loser. Not only are the Silver Line options 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 NPC 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