

March 31, 2005

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Executive Office of Environmental Affairs
Attn: MEPA Office
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The bus rapid transit proposal for Phase 2 of the Urban Ring purports to be a penny-wise alternative to a full-blown rail transit development along this circumferential corridor. In reality, however, it is a pound-foolish boondoggle that will not accomplish its stated objectives, because it cannot. In seeking to build this line “on the cheap” by making it initially a bus system, the construction of its tunnels and busways will waste yet more hundreds of millions of dollars to create something that will not function well—if it works at all. Its high cost would likely also preclude the building of the Ring’s final, Phase 3 rail component (currently planned to traverse only the more affluent half of the Ring, avoiding such underserved areas as Chelsea, East Somerville and North Dorchester).

While initially more expensive, it would be far more cost-effective of our precious tax dollars to construct the Urban Ring “right” in the first place, as a rapid transit or light rail transit line. Built as light rail, it could incorporate feeder lines like some of the current Green Line branches, the proposed extension to Somerville and Tufts University, and other possible radial additions like the former Saugus Branch of the Boston & Maine railroad. As Somerville and Medford residents have so eloquently demonstrated again and again at public hearings over the last few months, they desire a *direct* connection into the Green Line at Lechmere. What is proposed here, however, will not achieve that aim and must not be touted as a substitute for this well-articulated need for service to downtown Boston.

In closely examining the routing of the Phase 2 BRT system, it is clear that this is not a truly *circumferential* line, but a series of six overlapping bus lines forming tangents of a circle. Thus it would be necessary to transfer repeatedly to go any distance along its route, defeating the very purpose of a circumferential line. While it is touted as an example of Bus Rapid Transit technology, only portions of the route are to run on dedicated busways, meaning that the bulk of its mileage will be in mixed traffic. I have visited Ottawa and seen BRT in action; this does not look much like it. Nor is it the example of environmental justice that its proponents proclaim, for service to Dudley Square seems like an afterthought and the route cannot substitute for a direct rail connection—once again, into the subway and to downtown.

While its planners propose that many of the existing streets and highways to be incorporated into the Urban Ring would have specially marked bus lanes, what the Authority has accomplished thus far on the “Silver Line” in the South End and Roxbury is not promising. There they have designed and built a boulevard where automotive traffic has annexed the transit “reservation” as one more traffic lane, and cars double park in the path of the oncoming buses—just as the Washington Street Corridor Coalition and many other observers predicted years ago when those plans were subjected to public review. (Despite the recent attempts of MBTA officials to blame the situation on this winter’s heavy snowstorms, such congestion is a year-round problem the length of the route.)

Many of the streets proposed for the routing of the Urban Ring are too narrow to successfully accommodate bus lanes, particularly in the Fenway and Audubon Circle neighborhoods and on the Boston University Bridge. Any new bus along this corridor will get stuck in traffic, just as the “Silver Line” and so many other MBTA buses do today. Moreover, in places where the Urban Ring is planned to have its own right of way, like the abandoned Grand Junction railroad through Everett, Chelsea and East Boston, one must wonder if the route is really a thinly disguised highway project, also designed for trucks and other non-transit vehicles? If so, you should finance its construction with highway money, not transit funding.

Such inconveniences as I have described will defeat the purpose of the Ring, as riders would likely still prefer to travel to downtown Boston on the more rapid arterial lines, so they can make just *one* transfer to get to their ultimate destination. Only if this project is conceived of with a core “spine” extending along its entire distance, can there truly be an *Urban Ring*. On examination of the present proposal, it is clear that solely a unified *rail* transit system will allow the Ring to operate as a coherent whole, an integral part of our public transportation system. Anything less makes no sense and is an egregious waste of our scarce public resources.

Sincerely,

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