

September 14, 2009

Secretary James Aloisi
Executive Office of Transportation
10 Park Plaza, Suite 3170
Boston, MA 02116

Delivered via Adobe PDF to James.Aloisi@eot.state.ma.us

RE: Route 28X Bus Enhancements Project

Secretary Aloisi:

LivableStreets Alliance, a non-profit transportation advocacy group, believes that public transportation is the foundation for an efficient, cost-effective, environmentally sustainable, and health promoting transportation system. We also believe that the Roxbury-Mattapan area has been shamefully underserved by the metro region's public transportation for too many years. We are therefore strong supporters of the general idea of upgrading the services available along Blue Hill Avenue and Warren Street, which is the underlying purpose of the 28X project.

However, our support is significantly qualified because of many concerns about the current design and process of this project. Fortunately, we believe that these problems can be resolved and we hope this letter will help hasten those adjustments – in which case we would be proud to be a visible and public supporter of the effort. The following are some of our most significant concerns.

1) Need to Improve Bicycle Accommodations

Massachusetts' new, award-winning roadway design guidelines require a "complete streets" approach to all construction. "Starting from the sidewalk and moving inward" means taking into account the needs of all modes – walking, cycling, transit, and cars. While we applaud the 28X emphasis on transit, we feel that the total absence of bicycle infrastructure – whether an open bike lane, or even better a protected bike lane (cycle track), or even a shared bus/bike lane – on any part of the route from Mattapan Square to Dudley Station is an inexcusable violation of the state's own transportation rules.

2) Need to Incorporate More Rapid Transit Features

Enhanced bus service is a worthy improvement. We applaud the creation of a dedicated bus lane (or queue-jumper lanes where a full dedicated lane is not possible), fare vending machines at stations, express service (along with the continuation of "regular" local bus service on the rest of the road), and signal prioritization. But current plans shortchange the community by not incorporating several rapid transit features. For example, there's a huge difference between "signal

priority" (which is what the Silver Line infamously has, with very limited impact) and "signal pre-emption" (which would automatically turn traffic lights green as the bus approaches). We still have questions about the design of the stations in terms of their ability to both provide same-level entering and exiting on Blue Hill Ave while dealing with very different conditions in other sections of the route. And we have heard that cash will still be collected as people enter the bus, rather than relying on full-service prepayment machines prior to boarding so that passengers can enter using any door.

3) Need to Change Planned Use of Concrete Barriers to Separate the Bus Lanes

There is absolutely no need to create such an intimidating barrier down the center of Mattapan. This is not appropriate for the 30 or 35 mph design speed – many other US systems use pavement color or stripping, rumble strips, or even bollards, and video enforcement. While it is vital to control jay-walking, the proposed concrete barriers create other problems. For example, Morning Star Baptist is within a 5-block segment with no proposed opening in the barrier for anyone to cross to the church. And it creates huge operational costs – without barriers the city can continue to plow the bus lanes; with barriers the T will have to contract out the work at its own expense. The replacement of the barriers with less intrusive elements will also create space for bike lanes as well as other mitigations along the route, like connecting the park to Talbot, or traffic calming at various points. Not putting in barriers would allow a street layout of (a) an exclusive, 10'-6" non-separated bus lane; (b) two 10' general purpose travel lanes; (c) one 5' bicycle lane; and (d) one 7' parking lane, even though some parking spaces would need to be lost adjacent to where the few bus stops would be built.

4) Need to Include More Improvements to the Warren-to-Dudley segments as well as to the Existing Silver Line routes.

The section of the 28x route past Blue Hill Avenue is much more complicated. We are concerned that current plans will not sufficiently improve the quality and travel time in this area. In addition, the existing Silver Line route through the South End needs to be given "signal pre-emption" rather than the current version of "signal prioritization." Pre-boarding fare payment systems have to be created along with faster entering/exiting capabilities. The "no driving or parking in the bus lanes" regulations need to be enforced – along with the provision allowing bicycles to use the lane. Finally, although we support the extension of Silver Line service to South Station, the proposed route needs to be adjusted to better meet community needs from Dudley through the last part of the South End.

5) Need to Put More Emphasis on Pedestrian Comfort and Overall Aesthetics

A commitment needs to be made to not create bus contra-flow lanes, to significantly enhance pedestrian safety through bulb-outs, raised intersections, expanded sidewalks, mid-intersection "rest stops," regularly revised signal timing, and other methods. The possibility of saving some of the median trees by small changes along the impacted blocks should be explored. We also hope that a careful block by block analysis of parking needs be done leading to, where possible, a reduction or use of space-saving innovations such as "reverse angle" parking (as is presently done on Blue Hill Ave in front of the police station). We hope a similar review would show that there are places where the existing curb should be moved and/or the existing two motor vehicle lanes will be cut to one.

6) Community Support Needs To Be Cultivated

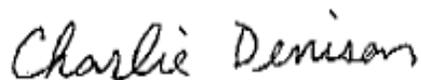
While the timeline for federal funding is tight, and relations between the Administration and the Legislature aren't perfect, rushing this project just creates additional mistrust that EOT is once again mistreating non-white communities. A new approach is desperately needed. The State House as well and the Congressional delegations need to be briefed. There needs to be a series of small group meetings with ministers, business associations, civic groups, and others to explain the project and give people a chance to constructively express their concerns – as well as to get good answers from EOT. The state has to avoid overpromising or dishing out hype – dropping the BRT description was a good beginning, but maybe the whole project should simply be described as a street improvement with a bus lane.

In summary, we are excited about EOT's commitment to public transportation and the future integration of state-wide planning across all modes. But we do not think that a positive future will come from shortchanging walking or cycling for the sake of transit, any more than the transportation system of the past was improved by shortchanging them for the sake of cars.

We hope this letter makes clear both our support for the overall idea and our concern about many of the current (but we believe changeable) design details.

We would be happy to discuss any of these comments in further detail with anyone from EOT. Charlie Denison will serve as our point of contact. His phone number is 617-852-6125 and his e-mail address is charlie@livablestreets.info

Sincerely,



Charlie Denison
Board Member & Advocacy Director
LivableStreets Alliance

CC:
Kate Fichter, EOT <Katherine.Fichter@eot.state.ma.us>
Colin Durrant, EOT <Colin.Durrant@eot.state.ma.us>