

July 23, 2009

Secretary Ian Bowles
Executive Office of Energy and Environmental Affairs
MEPA Office
100 Cambridge Street, Suite 900
Boston, MA 02114

RE: Comments on the Environmental Notification Form for the Broadway/Alford Street
(Route 99) improvements in Boston and Everett

EOEA #14443

Dear Secretary Bowles:

LivableStreets Alliance, MassBike, WalkBoston, Institute for Human-Centered Design, and Bike to the Sea would like to take this opportunity to comment on the proposed design for Alford Street and Broadway (Route 99) in Everett and Boston.

We are pleased to learn that improvements are being made to this key route. There is great potential to improve safety and comfort for both motorized and non-motorized users. We applaud efforts to make this new design pedestrian and bicycle-friendly. We are pleased that the overall cross-section of the Alford Street segment will remain the same, and will not intrude further into the Everett residential neighborhood. We also want to point out that the project is an opportunity to demonstrate the ways in which the state can accommodate diverse interests as it proceeds in meeting continuing demands for upgrading its facilities.

The challenge

Route 99 poses a real opportunity and a real challenge. It represents the opportunity to demonstrate a new approach to renovating existing streets in keeping with evolving state policies and planning. It poses the challenge of serving widely diverse users within a single corridor. Developing a design that is a “complete street” for all its users, be they vehicles, bicycles, bus riders or pedestrians will require very careful balancing of the constrained space that is available. Under the new transportation act’s healthy transportation compact, the project design needs to be guided by joint and coordinated efforts between the state secretariats of health, transportation and the environment. Route 99 provides a perfect test of our ability to design transportation improvements that fulfill the transportation needs of its users, aid the health of the community, and help to reduce the impacts of our transportation choices on the local and the regional environment.

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Secretary Ian Bowles, Re: Alford Street and Broadway (Route 99) EOE #14443
C/o LivableStreets Alliance, 70 Pacific Street, Cambridge, MA 02139

Our concerns about the proposed design

We are concerned that the proposed design does not adequately meet the needs of all users. While it is accommodating for the heavy truck and auto traffic, it is not as friendly for cyclists who currently use or wish to use this roadway, it limits some important uses of transit, and the proposal unnecessarily takes space away from sidewalks serving the adjacent residential community. The issue is the balancing of interests of the corridor users against the background that all have a stake in the way that the “complete street” is designed and constructed.

1. A Complete Street Serving Bicycles

This is the key route (and for many, the only route) for bicyclists traveling to and from Boston, Everett, Chelsea, East Boston, and the North Shore, because the Tobin Bridge, Callahan, Sumner, and Ted Williams Tunnels do not allow bicycles. In addition, it serves as the primary route for bicyclists to and from Logan Airport. Furthermore, it will serve as the primary route for users of the Bike to the Sea/Northern Strand Trail until a pedestrian/bicycle crossing of the Amelia Earhart Dam is constructed. Here are ways the corridor can accommodate bikes:

a. Along the Alford Street segment, bicycle lane stencils could be easily added to the existing shoulders, as they already meet the recommended width requirements (5') for bike lanes.

b. Along the Broadway segment, bicycle lanes should be provided. The proposed design has a 4' shoulder in the southbound direction and a shared 15' lane in the northbound direction. We are particularly concerned that the shared lane will discourage bicyclists from riding along this route, in part because it carries a high volume of traffic, most notably a large percentage (6%) of truck traffic.

The shoulder/wide outside lane bicycle accommodation is insufficient in our opinion, based on some of the existing MassHighway Design Guidelines:

5.3.2.2 “Shoulder Use [for bicycles]... shoulders are usually used for bicycle accommodation in rural and suburban low density areas, where on-street parking, curbs, and sidewalks are rarely encountered.”

5.3.2.3 “In cases of low speed, low to moderate traffic volumes, and low occurrence of trucks and buses, the shared lanes may be adequate to support bicycling. Before deciding to provide shared lanes as bicycle accommodation, the designer should be certain that the traffic volumes and motor vehicle speeds will be low enough so that all types of bicyclists can comfortably use the roadway.”

Broadway does not meet the criteria of either of these guidelines. We therefore feel that the following guideline is particularly appropriate:

5.3.2.1 “Bicycle lanes should be incorporated into a roadway when it is desirable to delineate available road space for preferential use by bicyclists and motorists, and to provide for more predictable movements by each.”

c. Along the Broadway segment, the southbound bicycle lane should be at least 4’ wide.

The existing shoulder is sufficient to allow for a 4’ wide bicycle lane, which should be acceptable since it’s not up against parking, although 5’ is preferred.

d. Along the Broadway segment, the northbound bicycle lane should be at least 5’ wide, to allow for through bicycle movement and to add safety for bicyclists who ride immediately adjacent to the parking lane.

2. A Complete Street Serving Pedestrians

The need to accommodate both trucks and bicyclists in the curb-to-curb cross-section should not require that sidewalk space be taken away from the neighborhood. Broadway is the edge of a dense residential community and its sidewalk provides access to the neighborhood. We feel quite strongly that taking away space from sidewalks should not be part of any of the alternative improvements for this project. Please refer to the attached photo of a typical 10’ section of sidewalk along Broadway adjacent to the residential neighborhood.

a. Sidewalk narrowing should not be a part of the proposed improvements.

The east side of Broadway is residential in character, especially north of the intersection of Broadway and Bow Street. This residential district is quite well-defined, extending about 700’ to the east and about 2000’ north-south along Broadway. Within this area, the residences are densely built on relatively small lots, requiring many of them to be very close together. Houses are built right up to the sidewalk line. Sidewalks in this dense neighborhood with modest housing should not be diminished in quality and convenience by being narrowed.

b. Safe crosswalks should be provided at regular intervals

Proposed crosswalks are located at Bowdoin Street, Beacham Street, and Dexter Street. The crosswalks at Bowdoin Street and Beacham Street are to be equipped with both traffic and pedestrian signals. No pedestrian signal is shown at the Dexter Street intersection. Each of the crosswalks is near a bus stop serving southbound transit riders. The distance between the Dexter Street crosswalk and the Beacham Street crosswalk is about 1700’. The distance between the Beacham Street crosswalk and the Bowdoin Street crosswalk is about 700’.



c. Getting the details right is key

We ask that all pedestrian signals be Accessible Pedestrian Signals that comply with ADA requirements and have countdowns, that benches will be placed at key locations, and that bus shelters and bike parking are located at convenient locations that don't interfere with the pedestrian route. Finally, please ensure that at all driveways and alleyways, the sidewalk elevation is maintained and not sloping down to roadway grade and that curb returns/driveway aprons are kept to a minimum depth (18' preferred).

3. A Complete Street Serving Vehicles

a. To accommodate vehicles, pedestrians and bicyclists in this corridor, vehicular lane widths should be narrowed slightly.

The MassHighway Design Guidelines allow discretion in determining lane widths.

b. Lane widths of 12' are particularly unnecessary along the Broadway segment, because the extra width comes at the expense of providing bicycle lanes and results in narrowing of the east-side sidewalk.

Again referring to the MassHighway Design Guidelines, we assume that the current design is based in part on the following:

5.3.4.2 "In high volume, high truck and bus percentage, and high design speed areas, 12 foot lanes are particularly desirable."

However, another guideline gives a bit more flexibility:

5.3.3.3 "Travel lanes between 11 and 12 feet in width are usually selected for design cross-sections and are particularly desirable for roadways with higher design speeds (45 mph or more), high traffic volumes (2,000 or more ADT), or higher truck and bus activity"

c. 11' lanes for vehicles should be adequate, and 10.5' lanes should be considered

Based on the guideline 5.3.3.3, and the fact that Broadway is being designed for 30 mph, we believe strongly that providing 11' lanes should be more than adequate to accommodate the bus and truck traffic along Broadway. As you'll see in our cross-section proposals below, 10.5' lanes would work even better to make the necessary space available for pedestrians and bicyclists, alone, or in combination with 11' lanes. Furthermore, the MassHighway Design Guidelines emphasize the importance of ensuring the safety and comfort of a roadway's most vulnerable users before allocating additional space to motorized users.

4. A Complete Street Serving Transit Riders

Transit service is essential along this corridor, especially in light of the large transit dependent population (24% of Everett's commute trips are via transit or walking, according to journeys to work data). Bus stops are currently provided at regular intervals along the route. Bus shelters are provided principally on the west side of the street. The sidewalk on the west side of Broadway is 6' wide and appears to be continuous along the full length of the proposed improvements. This width is just sufficient to serve the present foot traffic along this side of the street, focused primarily on these bus stops. As the many vacant parcels along the corridor are re-developed, we would expect pedestrian volumes to increase.

a. The bus stop at Thorndike Street should be replaced.

The existing bus stop serving southbound passengers on the west side of Broadway near Thorndike Street should be included from the plans. A crosswalk here appears to be intended to serve the bus stop. Without this bus stop, the distance between stops serving southbound bus passengers appears to be in excess of 1500 feet in an area where many residences face either Broadway or Bow Street. By contrast, the distance between stops serving northbound bus passengers appear to average between 750-800 feet.

b. A crosswalk should be provided at Chemical Lane

At Chemical Lane, a bus stop is proposed to serve southbound passengers on the west side of Broadway. At this location there is no crosswalk, requiring transit riders to go either north to Thorndike Street or south to Dexter Street to cross Broadway. Safety provisions for potential bus riders should be added at this location.

5. Complete Street Reconstruction options

Recognizing the need to accommodate pedestrians, bicyclists, and the large volume of truck and bus traffic, we would like to propose three alternative options for the Broadway segment of this project.

	Current proposal	Alternative 1 (preferred)	Alternative 2 (good)	Alternative 3 (acceptable)
Sidewalk	6'	6'	6'	6'
Shoulder	4'			
SB Bike lane		5'	4'	4'
Travel lane	11'	10.5'	11'	11'
Travel lane	12'	10.5'	10.5'	11'
Travel lane	12'	10.5'	10.5'	11'
Travel lane	15'	10.5'	11'	11'
NB Bike lane		5'	5'	5'
Parking lane	8'	8'	8'	7'
Sidewalk	8'	10'	10'	10'
TOTAL	76'	76'	76'	76'

Note that all three alternatives leave the existing 10' east-side sidewalk dimension. This is a key part of preserving the livability of the adjacent neighborhood. Equally important, all three alternatives provide marked bike lanes in each direction.

Alternative 1 is our preferred option. It fully accommodates non-motorized users, leaving the current 10' east-side sidewalk intact and providing 5' bike lanes in each direction, along with four 10.5' travel lanes. Although 10.5' does not meet the recommended minimum for heavy bus and truck traffic, 10.5' lanes have been used by MassHighway in and around Boston on major arterials with bus and truck traffic. We recognize that including these 10.5' lanes will most likely require a Design Exception to be obtained for this project, but we request that this alternative be considered if at all possible because of the significant benefits it provides to pedestrians and bicyclists.

Alternative 2 provides 11' outside travel lanes to better accommodate trucks and buses, which are more likely to be using the outside lanes, by narrowing the SB bike lane to 4' instead of 5'.

Alternative 3 takes away an additional 1' from the NB parking lane in order to provide four 11' travel lanes while still providing bike lanes in each direction (4' SB, 5' NB).

Coordination with other projects

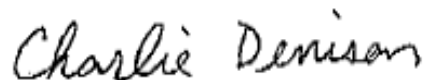
The City of Boston is undertaking a comprehensive redesign of Rutherford Ave and Sullivan Square. This redesign project will include many improvements for pedestrians and bicyclists throughout the area, including wider sidewalks, improved pedestrian crossings, bicycle lanes

and multi-use paths. Coordination of this Route 99 project with the Rutherford Ave/Sullivan Square project will strengthen and best connect the improvements being made. Since the Rutherford Ave/Sullivan Square project is still in the preliminary design phase, interim pedestrian and bicycle improvements could be made by the City of Boston along the corridor, for example bicycle lanes and improved or additional pedestrian crossings.

In addition, it is our understanding that a separate project currently exists to reconstruct the Alford Street Bridge. Bicycle lanes could easily be added to that project to connect to bicycle lanes that are created as part of this project.

Thank you for considering our ideas and suggestions as the design process moves ahead. If you have any further questions about our comments, please contact Charlie Denison of LivableStreets Alliance. Charlie can be reached at 617-852-6125 and charlie@livablestreets.info

Sincerely,



Charlie Denison, Board of Directors, LivableStreets Alliance

On behalf of:

David Watson, Executive Director, MassBike

Chris Porter, Chair, MassBike Metro Boston Chapter

Wendy Landman, Executive Director, WalkBoston

Christopher Hart, Director of Urban and Transportation Projects,
Institute for Human-Centered Design

Janet Green, President, Bike to the Sea

CC:

Luisa Paiewonsky, Commissioner, Mass. Highway Dept.

Frank A. Tramontozzi, P.E., Chief Engineer, Mass. Highway Dept.

Tom DiPaolo, Asst. Chief Engineer, Mass. Highway Dept.

Muazzer Reardon, Rte. 99 Project Manager, Mass. Highway Dept.

Lou Rabito, Highway Design Engineer, Mass. Highway Dept.

Ned Codd, Director of Program Development, Exec. Office of Transportation

Vineet Gupta, Director of Planning & Policy, Boston Transportation Dept.

Nicole Freedman, Director, Boston Bikes

Marzie Galazka, Director of Community Development, City of Everett

Julius Ofurie, City Engineer, City of Everett

Erik Scheier, Mass. Bay Transportation Authority



Attachment 1: Photo of existing sidewalk on east side of Broadway

