

To: General Manager Poftak

CC: Secretary Pollack, Fiscal and Management Control Board, and MassDOT Board

Date: June 24, 2020

Subject: Recommendations for Continuing to Keep MBTA Riders and Employees Safe and to Support the Commonwealth's Economic Recovery

Dear General Manager Poftak:

Thank you to your entire team at the MBTA for your hard work and quick response during this COVID-19 public health and economic crisis. The MBTA has proven itself as a critical lifeline, allowing essential workers to get to their jobs and enabling thousands of people to access health care, get to the grocery store, and carry out other necessary tasks. The MBTA has always been essential to keeping Massachusetts running; that is true now more than ever.

As Massachusetts begins a phased reopening, we know that safety and public health will be top-of-mind as more riders return to the MBTA. [Recent polling by the MassINC Polling Group](#) has shown that this crisis has raised anxiety and fear for many riders about the safety of transit. Those who have a choice might avoid transit for some time. However, many of the MBTA's core riders do not have other transportation options. We must ensure public transit continues to be safe and reliable for these core riders, and all riders, and for every MBTA employee and partner working to keep the system running.

The following near-term and longer-term recommendations are intended to both highlight positive steps the MBTA has already undertaken and provide feedback on areas where the MBTA can do more to ensure rider and operator safety, address perceptions that transit is unsafe, and enhance the safety and efficiency of the system. While their focus is public health, these recommendations will also improve the accessibility, equity, safety, and effectiveness of the vital public system that you manage.

Near-term, within the next 1-2 months:

- **Prioritize Frequent and Multilingual Communication.** Given the rapidly changing context, we encourage more frequent and direct communication from General Manager Poftak and Secretary Pollack to the public, especially when changes related to public health and service schedules occur. Updates should also be shared with riders in multiple languages and in multiple formats, including online (web, social media, apps), in print (signage and handouts) and audio (announcements on vehicles and at stations). We encourage you to think beyond vehicles, stops, and stations, and to work with municipal and community partners to ensure important information is disseminated at key locations

such as grocery stores, health centers, in newspapers, and through other news outlets, especially outlets that do not primarily communicate in English.

- **Ensure Transparent Communications About Cleaning.** The MBTA has been a national leader in adopting best practices to sanitize vehicles during this crisis, but many members of the public are still unaware of these efforts. We recommend enhancing communications regarding the cleaning protocol the MBTA is following and providing real-time updates to riders about when a vehicle or station was last cleaned. One low-tech option for implementing real-time updates about cleaning is to simply add signs on vehicles and in stations where staff can mark the last time these locations were cleaned. This is a well-known method that the public is familiar with and trusts. This transparent method of communication provides accountability and allows riders to feel confident the MBTA is doing what it has promised to keep riders safe and healthy. We also recommend providing more opportunities for riders to communicate concerns about cleaning directly to the MBTA. This could be accomplished by providing a dedicated phone number and webpage where riders can share concerns about unclean or unsafe conditions.
- **Provide Face Coverings to Riders, Especially When Their Use is Mandatory.** We fully recognize the constraints the MBTA faces in accessing masks during this time. But it should be a goal of the agency to provide a face covering to every rider who does not have one. Transit agencies in other large cities, including in Detroit¹ and Philadelphia,² are succeeding at providing masks to keep both riders and drivers safe. We support the recent announcement that you will be piloting face-covering dissemination at and along some of the busiest bus and subway stops and lines and hope this work will be expanded in the coming weeks. For many low-income riders, the burden of acquiring or making masks -- or other types of face coverings -- presents an unnecessary challenge. Providing no-cost face coverings to riders also reduces potential conflict between non-compliant riders, MBTA staff, and Transit Police. Regardless of whether people are or are not wearing masks, the Transit Police should never use its enforcement power to require riders to wear face coverings.
- **Prevent Overcrowding Through Increased Frequency and Responsive Scheduling.** Frequency of service is an essential tool in preventing crowding, especially for riders without other transportation choices. While we recommend that the MBTA return to full service as soon as possible, we appreciate that adjustments are necessary to reflect both MBTA employee availability and lower thresholds for crowding, particularly on buses. The sooner the MBTA gets back to full service the better. But full service must also remain flexible. We applaud the MBTA's quick actions to address crowding and adjust service

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<https://www.nbcnews.com/news/us-news/detroit-bus-riders-receive-free-face-masks-slow-spread-coronavirus-n1179206>

2

<https://www.inquirer.com/transportation/coronavirus-septa-free-face-masks-riders-bsl-mfl-stations-20200415.html>

during the early stages of the stay-at-home advisory and the recent scheduling adjustments to ensure 30% of bus operators schedules are “flexible”, allowing for day-of route adjustments. We recommend that the MBTA build on this adaptive and responsive approach. Similar to actions taken at San Francisco’s Muni,³ we recommend that the MBTA reallocate resources to provide increased service to best serve Environmental Justice communities⁴ and other neighborhoods where transit ridership (especially bus ridership) has stayed relatively high through the public health crisis, even if this means potentially temporarily reducing service in less transit-dependent communities. Many in those communities have continued to make necessary trips throughout the stay-at-home advisory, and they must be prioritized. Further, returning to full service on bus routes serving environmental justice populations with high ridership may not be enough to ensure a reliable service while supporting physical distancing on vehicles. The MBTA must evaluate whether reducing bus headways on such bus routes below the full service schedule is necessary.

- **Rethink Crowding Standards.** The crowding standards in place before the COVID-19 pandemic were already inadequate for the comfort and dignity of riders. Now and for the foreseeable future, creating more space for riders on each vehicle is even more critical. We recognize that crowding standards will likely need to evolve throughout the phases of reopening and that many complex factors lead to crowding. Instead of applying a hard cap, the focus should be on providing more information and communication so that operators and riders can make informed choices. We recommend that the MBTA create a “crowding warning” when the number of riders per vehicle reaches a set amount. This warning would prompt operators to notify dispatchers and alert them to the need to increase the frequency of a service. In addition, we recommend the front and rear destination signs show a message noting when a bus is close to or at maximum capacity, allowing riders who can wait for the next bus to make an informed choice. We also recommend utilizing official and third-party apps to note likely busy times so that riders who do have flexibility to adjust their travel times can do so before leaving their homes. This flexible model for managing crowding will only be effective if the above recommendations regarding frequency and responsive scheduling are in place. This is especially important in communities that have been hit hardest, like Chelsea, where overcrowding continues to be a concern.
- **Complete Installation of Driver Shields on All Buses and Trolleys.** Providing a physical barrier between bus and trolley operators and their passengers has a multitude of benefits both during this COVID-19 crisis and in the future. Even during regular flu and cold seasons, driver shields help protect bus and trolley operators from exposure to the many riders they encounter daily in close quarters. In addition, the physical barrier can also help

³ <https://www.sfmta.com/travel-updates/covid-19-muni-core-service-plan>

⁴ Environmental justice populations are defined in the Executive Office of Energy and Environmental Affairs Environmental Justice Policy, page 3, 2017, https://www.mass.gov/files/documents/2017/11/29/2017-environmental-justice-policy_0.pdf. See also Massachusetts Environmental Justice Viewer to map locations with environmental justice populations, http://maps.massgis.state.ma.us/map_ol/ej.php.

keep drivers safe from physical harm. We know the MBTA has already begun working on this, and other transit agencies including San Antonio's VIA system⁵ have successfully installed these barriers in response to COVID-19. The installation of these shields will add a visible marker of the MBTA's investment in the health and wellbeing of its operators.

- **Encourage Municipalities to Expand Pedestrian Space at Bus Stops and Trolley Stations.** There are many MBTA bus stops where there is insufficient space for riders to wait while also leaving enough space for people to pass at a safe distance along the same sidewalk. We recommend that the MBTA share data with municipalities about the busiest bus and trolley stops and provide design assistance to support municipalities in making more space at bus stops by removing adjacent curbside parking spots. In addition, we suggest the MBTA partner with municipalities to add physical distancing markers on the sidewalk to indicate the safest place for people to wait for their bus or trolley.
- **Explore Instituting Passenger Flow in Stations and Platforms.** To reduce the number of riders needing to pass by each other on narrow platforms, we recommend testing a uniform flow regarding where riders enter and where they leave busy stations and platforms. If implemented, those who need to use the elevator or other mobility assistance should be exempted from this protocol. The predictability of where to go can provide additional physical distancing space and prevent unexpected closeness with others. These needs must be balanced against the practical realities of station configurations and the need to avoid unnecessary conflict between riders.
- **Implement All-Door Boarding on All MBTA Trolleys and Buses.** We support the MBTA's decision to require rear-door boarding on buses and trolleys as it allows for physical distancing between riders and drivers. As more people are welcomed back onto buses and trolleys in the coming months and assuming drivers have appropriate protective shields, we recommend continuing rear-door boarding -- effectively implementing all-door boarding on all buses and trolleys -- through Phase 3. This will not only have the public health benefit of spreading out riders, but will also reduce dwell times up to 40 percent and increase transit frequency. These service improvements were demonstrated during the Silver Line all-door boarding pilot in 2017 where variability and dwell time were reduced, thereby shortening passenger trips⁶ and dramatically increasing passenger satisfaction.⁷
- **Expand the Lynn Commuter Rail Station Pilot to Serve More Communities.** We were very supportive of the brief pilot in May 2020 that allowed riders to pay Zone 1A fares at the Lynn Commuter Rail Station and the announcement of its extension. We recommend an expansion of this pilot at other Commuter Rail stops across the system. Implementing a fare policy that will induce riders to shift from over-burdened bus and subway lines to underutilized commuter rail lines is an innovative way to do more with existing MBTA resources.

⁵ <https://www.viainfo.net/covid-19/>

⁶ <https://www.mbtackontrack.com/blog/74-all-door-boarding-pilot-on-the-silver-line>

⁷ <http://www.bostonbrt.org/silver-line-demo>

- **Allow Bicycles on Commuter Rail and Subway Cars at All Times.** During this time of lower ridership, we recommend that the MBTA allow people to bring their bicycles onboard commuter rail and subway cars throughout the day (typically bicycles are only allowed off-peak). This will allow for an easier transition between the first and last mile of trips.

Longer-term, within one year:

- **Redefine Key Bus Routes With an Equity Lens.** Ridership data collected during this time highlights which routes are critical for environmental justice communities, including low-income riders and riders of color, as these are the routes where ridership has not dropped as significantly. We recommend that the MBTA continue to reallocate resources to increase frequency on these routes and redefine these routes as key bus routes where relevant, regardless of their ridership levels. The needs of the people served by these routes are not new or unknown (see *64 Hours: Closing the Bus Equity Gap*).⁸ Ensuring good and reliable bus service for our most vulnerable communities should be a long-term priority of the MBTA, and shouldn't end when the immediate public health crisis has abated.
- **Work with Community and Business Leaders to Reshape Full Service.** Before many white-collar employees begin to return to the office, the MBTA has the opportunity to work with business leaders to redefine rush hour. As we have learned from this crisis, remote work and flexible schedules are possible for many more workers than previously considered. The MBTA has already been coordinating with hospitals to adjust service based on employers' needs. We recommend that the MBTA continue to build on this work to help employers spread out peak service, allowing for a more gradual peak and reduced crowding. In addition, this will benefit employees who don't follow the 9 to 5 workday, many of whom receive lower wages and are already often traveling on either side of the previous peak hours.
- **Implement a Means-Tested Fare Program.** Before COVID-19, many people were struggling to pay their MBTA fares. Now, with significant unemployment and a likely slow recovery, ensuring all people have access to affordable fares is essential. We recommend that the MBTA work with public-sector partners to implement a means-tested fare program to allow people to make essential trips or get to their jobs. We know that the MBTA is wrestling with the many questions of how to deploy this program system-wide in the context of a challenging budget picture. It will be important for the MBTA to work with the Administration and legislature to ensure this program is sustainably funded and does not diminish the MBTA's ability to provide core service.
- **Increase Frequency of Commuter Rail Trips.** More consistent, frequent service will allow space to be physically distant. The MBTA should identify corridors such as the Fairmount

⁸ 64 Hours: Closing the Bus Equity Gap

<https://d3n8a8pro7vhmx.cloudfront.net/livablestreetsalliance/pages/6582/attachments/original/1569205099/ls-a-better-buses-2019-v9-20sep19.pdf?1569205099>

Line and stations such as Roslindale Village where Commuter Rail can relieve pressure on the bus network. The MBTA should work with community partners to do affirmative marketing and provide a way for riders to use their CharlieCard for payments. The MBTA should work with Keolis and labor unions to implement more off-peak trips to better serve essential workers and support mode shift from cars to trains. Additionally, schedule changes to most regions should be coordinated with the Regional Transit Authorities that will then need to alter their respective schedules.

Thank you for your consideration of these recommendations. We are grateful for your efforts thus far, and we are ready to work with you to ensure the MBTA remains a safe and essential service for residents of the Commonwealth.

Sincerely,

The 495/MetroWest Partnership
The Alliance for Business Leadership
Allston Brighton Health Collaborative
Alternatives for Community & Environment
Brigham and Women's Hospital, Stepping
Strong Injury Prevention Program
Conservation Law Foundation
Environment Massachusetts
Greenroots
Institute for Transportation and
Development Policy
John Snow, Inc.
Kendall Square Association
LivableStreets Alliance
MA Sierra Club
Massachusetts Coalition for the Homeless

Massachusetts Public Health Association
MassBike
MassINC, Gateway Cities Innovation
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