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February 9, 2009

Secretary Ian Bowles
Executive Office of Energy and Environmental Affairs
MEPA Office, Attn: Rick Bourre, Assistant Director
100 Cambridge St., Suite 900
Boston, MA 02114

RE: Comments on Draft Revised Environmental Impact Report – Urban Ring Phase II

Dear Secretary Bowles:

In November 2008 the Massachusetts Executive Office of Transportation and Public Works (EOT) filed a Revised Draft Environmental Impact Report/Draft Environmental Impact Statement (RDEIR/DEIS). This document included EOT's recommendation for a bus rapid transit (BRT) alignment through the 25-mile Urban Ring Corridor. The alignment would run in an approximately circular corridor, through key employment centers, major educational and medical institutions, and neighborhoods in Boston and six other cities. The recommended alignment resulted from a two-year alternatives analysis process which entailed comprehensive public review in which the Fenway Community Development Corporation (CDC), as a member of the Urban Ring Citizens Advisory Committee, was actively involved. The CDC offers support for the locally preferred alternative (LPA), with some important caveats.

We submit this letter on behalf of the CDC, a 36-year-old community-based organization that builds and preserves affordable housing and champions local projects that engage our full community in enhancing the neighborhood's diversity and vitality. These comments reflect a review of the LPA against our Urban Village Plan¹, the CDC's vision for the neighborhood as a smart-growth-oriented community that welcomes the broadest spectrum of residents. The plan sets goals in five key areas: 1) a sufficient and varied housing supply, 2) access to public transportation and reduced vehicular traffic, 3) community-building facilities, 4) a healthy business community, and 5) open space and a responsible impact upon the environment. Below is our assessment of how the project would advance those goals:

Transportation: The project will provide a mix of dedicated roadway and surface busways on which high-capacity, 60-foot articulated buses will travel. Buses will be powered by diesel-electric hybrid engines, with low emissions and low floors for easy boarding. The buses will operate in a tunnel connecting Yawkey and Fenway stations, the Longwood Area, and Ruggles Station. This connectivity among the Urban Ring, the Green Line, Orange Line, and the Worcester commuter rail line has the potential to bring substantial benefit to the Fenway: reduced congestion on area roadways. Additional benefits include diminished crowding on the Green and Red lines and at the downtown transfer stations; improved opportunities for smart-

¹ The complete text of the current version of the Urban Village Plan can be found at the Fenway CDC web site, www.fenwaycdc.org



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growth and transit-oriented development; and incentives for commuters in single-occupancy vehicles to switch to transit.

One significant problem: the LPA fails to connect to Kenmore Station on the Green Line's main trunk. Green Line passengers traveling from points east would have to exit Kenmore Station and walk to Yawkey to board Urban Ring buses. The LPA also fails to specify a station at the intersection of Ruggles Street and Huntington Avenue, where the Heath Street branch of the Green Line already stops. We urge EOT to give serious consideration to connecting the two networks at this location. By definition, BRT should have limited stops, but if one goal of the Urban Ring is to reduce stress on the Green and other radial transit lines, then connectivity is key.

The Urban Ring segment that would cross Allston is also of interest to Fenway residents, because so much commuter traffic comes into our neighborhood from that direction. The best route would be one that minimizes time spent in mixed traffic, at traffic signals, and making turns. With this in mind, the Allston segment south of Cambridge Street offers a superior route option that would assure fast, direct service between Harvard and Allston/Brighton and the Yawkey-LMA areas. Option (a), running beneath the Massachusetts Turnpike and along the Beacon Park Yards, is by far the best choice. Option (b), along part of Commonwealth Avenue, would be less favorable, while option (c), entailing travel in mixed traffic along Brighton Avenue, makes little sense and should not advance to the next planning stage. Similarly, among the options north of Cambridge Street, option (c), on Lincoln Street and Western Avenue, should be eliminated because it involves too much travel in mixed traffic.

Carefully planned infrastructure is key to successful BRT. A bus operating in a dedicated lane does not necessarily constitute rapid transit. Urban Ring buses should operate entirely free of interference from other vehicles (except at intersections). If there is any possibility that buses will mix with regular traffic, we strongly urge the use of automated enforcement technology that penalizes drivers who interfere with bus operations. Buses should follow the shortest possible route, with limited stops. Ticketing should take place at the stops (not on board), boarding should take place at grade, and the route should incorporate preferred signalization (transit signal priority). Without these essential elements, the Urban Ring will not qualify as true BRT.

With these caveats, Fenway CDC expresses support for the LPA as EOT files an application for funding through the federal New Starts Program.

Sincerely yours,

A handwritten signature in black ink that reads "Carl Nagy-Koechlin".

Carl Nagy-Koechlin
Executive Director

A handwritten signature in black ink that reads "Romin Koebel".

Romin Koebel
Member, Urban Village Committee