



50 Federal Street, 3rd floor
Boston MA 02110
(617) 423-5775
www.sierraclub.org/massachusetts

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Dear Focus40 Project Team:

On behalf of our over 130,000 members and supporters across the Commonwealth, the Sierra Club Massachusetts Chapter provides these comments on the Focus40 Plan for the MBTA.

Our population and economy are growing but our transportation system is not keeping up. The current system is heavily based on fossil fuels that generate harmful air pollution and emit greenhouse gases. Transportation is the largest source of carbon emissions in the Commonwealth, and this outsize share will grow as Massachusetts continues to reduce electric sector emissions through programs like the Regional Greenhouse Gas Initiative (RGGI). The Massachusetts Sierra Club recommends that we rapidly de-carbonize our transportation sector while also reducing vehicle miles traveled.

The MBTA is the most important statewide component for reducing vehicle miles traveled and relieving traffic congestion. We generally agree with Focus40 in program areas like resiliency, reliability and capacity. State of good repair of the existing system is absolutely necessary, but it is not sufficient and it is not happening fast enough. So we are also strongly advocating for expanding the T by increasing reach, frequency, and connectivity. We believe that the plan must be more holistic so that trolleys and buses are always considered together with rail and ferries -- our comments reflect this approach.

Increasing transit use benefits everyone in the state and should be reflected in the split between state funding and passenger revenue. Fares should be kept to an absolute minimum to increase ridership. The goal is to attract people away from choices that generally weaken the public system while increasing congestion and pollution such as private vehicles and ride sharing services.

Finally, we need to prioritize environmental justice in all our decisions. We need to adequately serve large populations that depend on transit because of income, choice or limited mobility.

Below is a list of projects organized into categories. Many are sample projects that can stimulate further thinking.



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Major Projects - Greening Existing service

We must commit to electrifying the T's buses and rail. Electrified vehicles have superior performance, are cheaper to fuel and maintain, and generate far less pollution and noise. The MBTA is the only commuter rail system on the Northeast Corridor without any electric service.

Focus40 should include a phased plan to transition a 100% electric bus fleet. We are pleased that MBTA is carrying out an electric bus feasibility study and pilot, but the Focus40 draft plan shows no electric bus procurements in commitments through 2023. In that time, the MBTA will add 194 hybrid buses with an additional 460, 40-ft buses scheduled for delivery by 2025. This means that a significant percentage of MBTA's bus fleet will remain tied to fossil fuels for well over a decade. The MBTA needs to invest in electric buses now while continuing to assess in-performance data to inform decisions about transitioning to a fully electric bus fleet.

The transition of the bus fleet should focus on environmental justice communities with the most significant air pollution. Replacing the Cambridge trolleybuses should be the last priority for replacement if ever, as they already do not have any tailpipe emissions. Trackless trolleys are (1) lightweight and require less energy; and (2) do not need charging or periodic battery replacement, which increases time in service. They could even be restored to the trolley lines they once were.

Mid-sized Projects - Improving Capacity and Redundancy

We need more modal equity between rail and highway. Some of these will restore rail service that was sacrificed for highways such as the Pike and I-93.

Some examples:

- Reducing bottlenecks and increasing redundancy such as the junction of the Old Colony lines with the Red Line, and the Green lines in Kenmore Square and Park Street with additional tracks and switches (e.g., so either eastbound track can continue at Park).
- Every rail station should have separate platforms for each direction (e.g., Newton).
- Straighten out alignments such as the curves at Boylston Streets and Government Center to improve speed and reduce noise. This will also allow the purchase of more standardized cars.
- Maintain state of good repair on Mattapan light rail line



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Major Projects - Increasing existing service

Frequency includes extending daily service hours, and weekend and seasonal service.

Continue to innovate around late night and early morning service (we commend the recent bus pilots).

Year-round weekend service:

Every T service should have minimum service on the weekends (2-3 times daily each way) throughout the year.

Some examples:

- Hull and Hingham commuter boat on the weekend.
- Cape Flyer weekend service throughout the year (until year-round daily commuter service is achieved).

Indigo Line:

Using rail lines inside Boston as transit while preserving commuter service:

- The Fairmount Line (with EMUs now if not eventually) with more frequent service.
- West Station should be in phase 1 of the I-90 MassPike Allston Interchange project.
- Grand Junction line - double-tracked. From West Station to Kendall, etc. This service would also serve as a component of the Urban Ring.

Major Projects - Integrating Existing service

- Red and Blue Line Subway Connector at Charles/MGH. (We also support the pedestrian tunnel connection from State Street to Downtown Crossing but this is a complement not a substitute for the subway connector.)
- The North South Rail Link (NSRL) instead of South Station Expansion to fill the gap in the Northeast Corridor and Commuter Rail system. Among its many benefits, the NSRL will (1) connect Gateway Cities across the Commonwealth; (2) remove people from the overcrowded subway connections; (3) significantly reduce midday idling of diesel trains and need for layover yards; (4) free up the



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Grand Junction by eliminating non-revenue north-side transfers. This was a high-priority project of the 2003 Program for Mass Transportation.

- Connect the Riverside Line and the E Line at Brookline Village to link Newton to east section of Longwood.
- Connect the Riverside D and Cleveland Circle stations directly.

Major Projects - Improving and Expanding service

- In general, we believe the system needs more light rail, which in many cases would be restoring historic routes that created much of the urban density one can still see today. Bus rapid transit (BRT) can be a significant improvement while assessing light rail. BRT needs its own system-wide plan. Key bus routes are obvious candidates (such as the 39 bus where the trolley was only recently decommissioned). One overarching goal should be creation of the Urban Ring.
- Green Line Extension Phase 2 to Medford should be in the "Priorities through 2040" category in line with earlier state commitments (e.g., the EIS).
- We support extending the Orange Line South to Roslindale
- High-level platforms on the Riverside Line
- Extend the underground portion of the E Line south under Huntington Avenue.
- Consider extending the Blue Line from Charles/MGH to Kenmore and/or Kendall Square, Cambridge (perhaps using the Volpe Center).
- Convert the underground portion of the "Silver Line" to light rail and connect it into the Green Line near Arlington Station to create more seamless transit service to the Seaport.
- Rebuild the "Silver Line" on Washington Street as a light rail branch of the Green Line and extend it from Dudley Square to Mattapan Square--as was proposed in the 1972 Boston Transportation Planning Review

Minor Projects: Entrances and Ramps

These projects save commuters time at low cost and do not require equipment:

- Allow Silver Line Buses to use the Silver Line Way Ramp onto Interstate 90 as originally intended.
- Braintree pedestrian connection improvements like the two pedestrian bridge concepts studied by the Central Transportation Planning Staff of the Boston Region Metropolitan Planning Organization as well as Metropolitan Area Planning Council (MAPC) pedestrian bridges from the MBTA Red Line/Commuter Rail Station to Union Place. Also a pedestrian bridge could be



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built along the North side of Union Street to the Commuter Rail Platform and then to the MBTA Red Line Station.

- Reopen the Hynes entrance to Boylston Street and the Berkeley Street entrance to Arlington station.
- Add entrances where there are exits such as at Clarendon Street at Back Bay Station; and at Ruggles Station up to Ruggles Street on the Orange Line.

Economic Justice and Fares

- Low fares especially in lower-income urban areas.
- Preserve cash payments. Many riders are unbanked.
- More free and reduced transfer opportunities between stations (e.g., Orange Mass. Ave. and E Symphony), and between bus and light rail.

We look forward to working with the state to implement this vision of transportation in the Boston region for present and future generations.

Respectfully,

Deb Pasternak
Mass. Sierra Club, Interim Chapter Director
deb.pasternak@sierraclub.org