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CERTIFICATE OF THE SECRETARY OF ENERGY AND ENVIRONMENTAL AFFAIRS
ON THE
ENVIRONMENTAL NOTIFICATION FORM

PROJECT NAME : MBTA Service Level Reduction
PROJECT MUNICIPALITY : Systemwide
PROJECT WATERSHED : Boston Harbor
EEA NUMBER : 16324
PROJECT PROPONENT : Massachusetts Bay Transportation Authority
DATE NOTICED IN MONITOR : March 2, 2021

Pursuant to the Massachusetts Environmental Policy Act (MEPA; M.G.L. c. 30, ss. 61-62I) and Section 11.06 of the MEPA regulations (301 CMR 11.00), I hereby determine that this project **does not require** an Environmental Impact Report (EIR).

I acknowledge the numerous comments received from members of the public, municipalities and non-governmental organizations in opposition to the service level reductions, including suspension of service and closure of certain commuter rail stations, particularly at a time when riders are starting to return to public transit and federal stimulus funding has recently become available to address the impacts of the COVID-19 pandemic. However, based on a review of the Environmental Notification Form (ENF) and comment letters, I do not find that a discretionary EIR is warranted. While I acknowledge the concerns expressed regarding accessibility to transit, potential impacts to Environmental Justice (EJ) populations, long-term greenhouse gas (GHG) emissions, and the process and timeline for restoring service, I note that the issuance of this Certificate does not signify the conclusion of the public engagement process for this project. As described below in greater detail, the Massachusetts Bay Transportation Authority (MBTA) has indicated a commitment to continuing an active and robust stakeholder engagement process through subsequent service planning review efforts.

Additionally, I note that MEPA review is limited by statute to those aspects of the project that are likely, directly or indirectly, to cause Damage to the Environment, as defined in the MEPA

regulations. Many comments received on the ENF focus on non-environmental or non-jurisdictional impacts with regard to the MEPA process. MEPA is an environmental impact disclosure process; MEPA does not approve or deny a project, but serves as a forum for a project proponent to identify potential project-related impacts and propose mitigation measures to offset these potential impacts. The MEPA process has provided a valuable forum for the collection of relevant points of view, but reconciling all of the identified (and sometimes competing) concerns is beyond the scope of the MEPA process. I expect the MBTA will continue to provide opportunities to solicit meaningful feedback from stakeholders to guide future prioritization and restoration of transit services.

Project Description

As described in the ENF, the MBTA is planning to adjust service levels across all transit modes in response to the significant drop in ridership (and revenue) that has occurred due to the COVID-19 pandemic and to hold resources in reserve to ensure that the MBTA is able to continue to provide key service to transit critical populations¹ who continue to rely on transit during the pandemic. Under current conditions, the MBTA serves 330,000 trips on an average weekday but is operating approximately the same level of service as it operated in September 2019 which served approximately 1.26 million trips. The MBTA has already adjusted service levels for commuter rail and ferry service and will continue to roll out service reductions for bus and rapid transit beginning in Spring 2021 and potentially continuing through Fall 2021. These changes will exceed the MBTA's major service change threshold of 10% below what was proposed for Spring 2020. The MBTA's plan to readjust service levels to current ridership is described in an overall program entitled *Forging Ahead*.

On November 9, 2020, the MBTA presented an Initial Base Service proposal that was subject to an extensive stakeholder outreach program, including nine regional meetings, two system-wide meetings, and 30 community meetings (described below in greater detail). Following these outreach efforts, the MBTA Revised the service level proposal to reflect stakeholder feedback, to better match current services with demand, and to account for expected ridership levels in the near future. The Revised Base Service proposal provides 85-90% of pre-COVID bus service to serve 41% of pre-COVID bus ridership, 75-80% of rapid transit service to serve 22% of pre-COVID ridership, 70% of commuter rail service to serve 13% of pre-COVID ridership and some ferry service. As described in the ENF, the proposed service levels assume the need for social distancing and, therefore, can accommodate growing ridership after social distancing is no longer required based on public health guidance. The proposal takes into account projected ridership through July 2021. The following table summarizes the proposed base service level reductions as initially proposed in November 2020 and the current proposal (*i.e.* the revised Base Service Proposal) as proposed in December 2020:

¹ Transit critical populations are defined by the MBTA as low-income households, communities of color, people with disabilities, households who have few or no cars, and elderly populations.

Mode	Fall 2020 ridership (vs. pre-COVID)	Projected ridership for July 2021 (vs. pre-COVID)		FY21 Scheduled service hours		FY21 Service Proposal	
		Scenario 3	Scenario 2	Modified Proposal for 12/14	Original proposal (11/9)	Modified proposal for 12/14	What changed vs. 11/9
Bus	41%	51%	55%	85-90% est.	85%	<ul style="list-style-type: none"> No change to hours of operation Suspend 20 routes, consolidate 16, shorten 4 20% frequency reduction system-wide non-essential routes 5% frequency reduction system-wide essential routes 	<ul style="list-style-type: none"> Service after midnight 6 Bus Routes (43, 131, 136, 230, 714, 716) Suburban subsidies to 5 communities
Rapid Transit	24%	28%	46%	75-80% (est.)	70%	<ul style="list-style-type: none"> No changes to hours of operation or footprint 20% frequency reduction to Green, Orange, and Red Line Up to 5% reduction to Blue Line 	<ul style="list-style-type: none"> Service after midnight Continue 95% of Blue Line service E Line to Heath Street
Commuter Rail	13%	16%	29%	70% (est.)	65%	<ul style="list-style-type: none"> Maintain partial weekend service Worcester, Providence, Newburyport/Rockport, Middleboro and Fairmount; suspend on low ridership lines End weekday service at 9 PM Reduce peak and weekday service Close 5 stations 	<ul style="list-style-type: none"> Continue to serve Cedar Park stop Partial weekend service on high ridership and transit critical lines
Ferry	12%	16%	29%	>0%, exact service TBD	0%	<ul style="list-style-type: none"> Suspend Charlestown and Hingham direct service Reduce weekday Hingham/Hull ferry 	<ul style="list-style-type: none"> Maintain partial Hingham/Hull weekday service
The RIDE	38%	40%	46%	No changes	No change	<ul style="list-style-type: none"> Adjust scheduling window from 30 to 40 minutes Adjust ADA to Premium based on fixed route changes Adjust hours of operation of Premium service to match Commuter Rail span 	<ul style="list-style-type: none"> Changes only reflect changes made to other modes

The proposed service level reductions represent a conservative or “worst case” scenario. While initial service level reductions for commuter rail service and ferry service went into effect in January 2021 and partial service level reductions for bus and rapid transit will go into effect in Spring of this year, the remainder of service level reductions may or may not go into effect in the Summer and/or Fall based on ridership levels and available federal funding. Further, the ENF indicates that the proposed cuts are not intended to be permanent. As described in the ENF, ridership did not decrease consistently across modes, lines, and routes, it will not be uniform in how it returns. However, when service is built back, it will not look the same as pre-pandemic service. The ENF indicated that the MBTA will use this as an opportunity to meet new post-pandemic transit demands while better serving communities and riders through strategic efforts like the Bus Network Redesign and RailVision as described further below.

Project Site

Proposed service reductions described in this ENF will take place across the entire approximately 3,200-square mile MBTA service area, which covers 175 cities and towns in Eastern Massachusetts. For the purpose of this ENF, the project site refers to the entire MBTA service area, since the proposed service cuts are system-wide. There are multiple Areas of Critical Environmental Concern (ACECs), Outstanding Resource Waters (ORWs), historic resources, and mapped habitats for endangered species within the 3,200-square mile project area. The service area also includes mapped EJ populations.

Environmental Impacts and Mitigation

The proposed service reductions do not involve any new construction within the project area that would disturb resource areas. As described in the ENF, the MBTA’s Forging Ahead service changes are not anticipated to increase any environmental impacts as measured by the MEPA review thresholds.

Instead, the ENF indicates that the project will result in air quality benefits in the form of reduced GHG emissions compared to the service originally planned to be operated in Spring 2020. The ENF indicates that the project will have environmental benefits while providing a level of service commensurate with demand.

Jurisdiction and Permitting

The project does not exceed any of the MEPA review thresholds identified at 301 CMR 11.03. However, the MBTA's enabling legislation requires that *"for a system wide decrease in service of 10% or more, the decrease shall be the subject of an environmental notification form initiating review pursuant to sections 61 and 62H, inclusive of chapter 30."*(M.G.L. c.161A § 5d). The MBTA statute does not specify how to measure or what metric to use in quantifying a 10% service reduction. In the absence of such guidance, the MBTA has determined that service hours² traveled by MBTA vehicles when in service is an appropriate metric against which to measure this reduction because it measures the amount of service that is being provided. The MBTA's proposed service reductions exceed the 10% threshold³ in the statute. The project does not require any Permits from State Agencies but will require approval from the MBTA's Fiscal Management Control Board (FMCB) as described below.

The proposed service level reductions were conditionally approved by the FMCB on December 14, 2020, and was contingent on the conclusion of MEPA review and completion of a formal Title VI Equity Analysis with a finding of no adverse impact (published on March 3, 2021). As described further below, the ENF asserts that the findings of the equity analysis indicate that the implementation of the service level reductions will not result in disparate impacts to minority populations, disparate benefits to nonminority populations, disproportionate burdens to low-income populations, or disparate benefits to non-low-income populations.⁴

Because the MBTA is the Proponent proposing to undertake the project, MEPA jurisdiction for any future review is broad in scope and extends to all aspects of the project that may cause Damage to the Environment, as defined in the MEPA regulations.

Review of the ENF

The ENF provides a description of existing and proposed conditions, a discussion of project alternatives, and identifies the methodology by which service has been and will be reduced to avoid, minimize and mitigate project impacts. The ENF included information presented at the MBTA's FMCB meetings, a summary of the public engagement outreach, and an analysis of equity implications of the service changes and regional air quality impacts prepared by the Central Transportation Planning Staff (CTPS).

The ENF included a Public Engagement Summary Report (December 2020) which described the public outreach efforts conducted to-date and included a summary of the feedback that was received. As described in the ENF, the MBTA undertook a public outreach campaign after the initial service level

² Service hours represent the total number of hours that MBTA passenger vehicles are in operation and available to customers.

³ The proposed service level reductions represent a reduction of service above 10% of the service levels proposed last year (Spring 2020), pre-pandemic.

⁴ The formal Title VI Equity Analysis was submitted to the MEPA office on March 8, 2021.

adjustments were proposed on November 9, 2020. As part of this effort, the Forging Ahead Community Engagement team collected comments from official public meetings, online surveys, “office hours,” phone calls, and the MBTA public engagement email. In total, there were 11 public virtual meetings (nine regional meetings and two system-wide meetings) with 2,010 attendees. The Community Liaison team also reached out to 266 community organizations in the MBTA service area and participated in 30 community meetings. Among these, three meetings were held in Chinese and two in Spanish. The ENF indicates that an additional 39 organizations agreed to distribute information to their constituents and over 7,000 comment letters were collected through this effort. Key themes in comments received included concerns regarding the methodology used to identify services to include in the base service; impacts on accessibility for people with disabilities; fare impacts of transfers or alternative transportation; elimination, consolidation, or shortening of routes; impacts on personal travel patterns; lack of access to destinations; frequency changes; increase in travel time; decrease of span on bus/subway and commuter rail; health and safety associated with COVID-19; and equity. In response to this feedback provided by stakeholders, the Revised Base Service Proposal was introduced at the FCMB on December 14, 2020. In addition, the MBTA Community Engagement staff has continued to hold weekly “coffee chats” in English, Chinese, and Spanish to provide individuals an opportunity to learn about the project and to share feedback.

Alternatives Analysis

As described in the ENF, the purpose of the project is to better align service levels with ridership levels which have dropped significantly due to the COVID-19 pandemic. The ENF identified a No Build Alternative, New Revenue/Cost Saving Alternative, and the Revised Base Service Proposal (Preferred Alternative). The No Build Alternative would maintain the same pre-COVID-19 level of service. While this would not result in any reduction of access for the riders, the MBTA has determined that this scenario is financially unsustainable. As described in the ENF, while the MBTA has received funding through the Coronavirus Aid, Relief and Economic Security (CARES) Act, as well additional funding in the recent Consolidated Appropriations Act, these funds are each a one-time infusion of monies. It is anticipated that these funds will assist the MBTA, but without additional cost controls, the MBTA will need to make additional and potentially more severe cuts in service in the future. As described in the ENF, economic forecasts indicate that a return to pre-pandemic scenarios will not occur for at least three to four years. As such, ridership demand and the corresponding fare revenue will remain low for this period of time. The ENF asserts that if the MBTA were to refrain from making reductions in services, it would be unable to secure resources for continued operations for the critical services. In addition, the MBTA would continue to operate vehicles carrying very few passengers that would be an inefficient use of financial and labor resources, as well as result in air quality impacts that could otherwise be avoided.

The New Revenue/Cost Saving Alternative would involve raising revenue via activities such as selling unused land, increasing advertising revenues and other measures. As described in the ENF, while the MBTA is working to generate additional resources by these means, there is a limit to how much can be raised, particularly during the economic downturn when demand for land or demand for new advertising is limited. The MBTA's other main source of revenue is fares paid by the rider. The MBTA has determined that any increase in fares would be an economic hardship to customers, particularly the most transit dependent riders and/or critical workers. As noted above, raising additional revenue as a way to maintain current levels of service also would cause air quality impacts that could otherwise be avoided. The MBTA determined that generating additional revenue to meet budgetary needs is infeasible and this alternative was dismissed.

As described in the ENF, the revised Base Level Service Proposal (as described herein) was selected as the Preferred Alternative because it maintains essential services, which are considered services that have a high ridership potential for FY22 and that serve high transit critical populations. Non-essential service consists of less transit critical services with low ridership potential for FY22. The Preferred Alternative was developed based on a framework created by the MBTA that would preserve essential services at or above the 2017 Service Delivery Policy levels.⁵ According to the ENF, for many people using essential services, service will continue to look very similar to that provided pre-COVID-19. Non-essential services will generally see less frequent service or elimination, which will enable the MBTA to prioritize and preserve essential services.

Transit Impacts

In determining where to reduce service, the MBTA developed a framework with the goal of preserving service at or above Service Delivery Policy levels for all services with high ridership and serve transit critical populations. The Service Delivery Policy was approved by FMCB in 2017 and quantifies MBTA's target minimum acceptable service level by mode across multiple metrics (including hours of operation, frequency, crowding, etc.). The currently proposed Revised Base Service proposal represents quality service for all essential services, as well as a reduced amount of non-essential service that is still viable for many of those who depend on it. The Forging Ahead initiative proposes service level reduction for bus, rapid transit, commuter rail and ferry services as follows⁶:

Bus Service

The MBTA will implement changes to Bus Service beginning in Spring 2021 (March 14, 2021). Initial adjustments will include: suspension of routes 18, 52, 55, 68, 79, 212, 221, 465, and 710; consolidation of routes 24/27, 136/137, 214/216/ 217. In addition there will be changes in hours of service to Route 67, 85, and 131; routes with routing changes: 211 and 435; and routes with trip changes: 9, 19, 36, 42, 45, 60, 80, 105, 108, 202, and 240. As described in the ENF, the service adjustments are proposed to eliminate redundant routes including routes that are within a quarter mile of other bus routes of rapid transit and routes with low ridership. Cumulatively, the service level adjustments include:

- Suspension of up to 20 routes including:
 - Routes within ¼ mile of bus or rapid transit alternatives: 55, 68, 80 (once the Green Line Extension (GLX) is operational);
 - Transit critical, low ridership routes with redundant options available on portion of most routes: 325, 326, 456, 18, 170, 221, 428, 434;
 - Low transit critical and low ridership routes: 52, 72, 79, 212, 351, 451, 465, 505, 710;
- Consolidation of 16 routes: 62/76; 84/78; 88/90 (with the GLX); 214/216; 352/354; 501/503; 502/504; 136/137;

⁵ The 2017 Service Delivery Policy was approved by the MBTA's Fiscal Management and Control Board in 2017 and quantifies MBTA's target minimum acceptable service level by mode across multiple metrics (incl. hours of operation, frequency, crowding). The full policy can be found here: <https://cdn.mbta.com/sites/default/files/fmcb-meeting-docs/reports-policies/2017-mbta-service-delivery-policy.pdf>

⁶ The most up to date service changes can be found here: <http://www.mbta.com/servicechanges>

- shortening four routes: 553, 554, 556, 558;
- 20 percent reduction for non-essential routes; and
- Five percent frequency reduction to essential routes.

Approximately 80 routes will continue to operate at or close to pre-COVID-19 service levels and an additional 20 routes will continue to operate at higher than pre-COVID-19 service levels including routes 16, 22, 23, 28, 104, 106, 109, 111, 116, and 117.

Rapid Transit

The MBTA will implement changes to Rapid Transit in Spring 2021. The rapid transit service adjustments include:

- 20 percent frequency reduction to Green Orange and Red lines; and
- Up to five percent frequency reduction to Blue Line.

Commuter Rail

Temporary changes to Commuter Rail service started in January 2021, with more changes going into effect in March and April. The first round of commuter rail service level adjustments involved reduced winter schedules including reduced weekend service. These changes were made necessary due to high levels of employees affected by COVID-19 which resulted in a reduction on employees available to safely operate the railroad at the previous level of service. Total service level adjustments are as follows:

- Elimination of all weekend service except for partial weekend service on the Worcester, Providence, Newburyport/Rockport, Middleboro and Fairmont Branches;
- Ending weekday service at 9:00 PM;
- Reducing peak and weekday service; and
- Closing of five stations (Plimptonville, Prides Crossing, Silver Hill, Hastings and Plymouth).

Ferry

The MBTA implemented changes to Ferry Service beginning in January 2021 including the suspension of the Charlestown ferry service as well as direct ferry service to Hingham (ferry service to Hingham via Hull continues at a reduced level). Total Ferry service level adjustments are as follows:

- Suspend Charlestown and Hingham Direct service; and
- Reduce weekday Hingham/Hull ferry service.

I received many comment letters that identify concerns regarding the elimination of Bus route 55 and impacts to proximate Fenway neighborhood of Boston which serves elderly and health-impaired populations. As discussed at the MEPA consultation session, held remotely on February 23, 2021, apart from a few stops in the Fenway neighborhood, Bus Route 55 directly parallels the Green Line. Supplemental information provided by the MBTA clarified that all of the Route 55 stops, including the stops within Fenway, are at most a twelve-minute walk from the Green Line which provides higher

quality transit service.⁷ I encourage the MBTA to consider engaging with riders from this area to ensure transit needs are being met. I also received a number of comments identifying concerns regarding the closure of the Silver Hill and Hastings stations. Comment letters also express concerns over reductions of service frequency even while crowding on some bus routes and the Blue Line persists under current conditions. I encourage the commenters to continue engaging with the MBTA during future opportunities for public input, including but not limited to the weekly “Coffee Chats”.

Restoration of Service

As described in the ENF, the vast majority of MBTA service will continue. Moreover, the planned service changes are not intended to be permanent and as described above, may not be fully implemented depending on ridership trends. The MBTA will periodically realign service to match current and future ridership patterns when durable (i.e. sustainable) revenue is available to pay for such service. As described in the ENF, because most of the proposed service changes involve frequency (rather than access or span), the MBTA will be able to monitor ridership to understand if it is increasing to the point where additional service is needed based on metrics established in the 2017 Service Delivery policy. Emphasis will be placed on essential services that serve high transit critical populations and have high ridership potential before moving on to what the plan defines as non-essential services. In addition to ridership, MBTA staff will monitor other data sources including passenger surveys, employer surveys, roadway data, general travel data and economic recovery planning. Planning scenarios will be refined and revised as necessary and ridership will be compared to scenario projections to understand which scenario most accurately predicts future ridership. This ridership data will be presented to the FMCB for comparison to planning scenarios and ridership projections. As outlined in the MBTA’s Service Delivery Policy, service planning takes place quarterly for bus and rapid transit and twice a year for commuter rail and ferry service (revised schedules are published at these times). The ENF notes that the timing of service restoration will depend on public health guidance (including guidance on the continued need for social distancing) and the timing of the Commonwealth’s post-vaccination re-opening plan. I note that monitoring ridership will be a critical part of restoring service commensurate with increasing ridership and encourage the MBTA to develop a comprehensive monitoring plan that enables timely realignment of service based on changing ridership patterns. Comment letters have expressed concerns over the lag time in restoring service, particularly for commuter rail and ferry service. Therefore, adequate planning ahead for restoring these modes will be an integral part of restoring service.

As ridership did not decrease consistently across modes, lines, and routes, it will not be uniform in how it returns. However, when service is built back, it will not look the same as pre-pandemic service. The ENF indicated that the MBTA will use this as an opportunity to meet new post-pandemic transit demands while better serving communities and riders through strategic efforts like the Bus Network Redesign and RailVision. The Bus Network Redesign is focused on re-imagining the MBTA’s bus network to reflect the travel needs of the region and create a more competitive bus service for current and future bus riders. The goal of the initiative is to better align the bus network with shifting demographics, emerging employment districts, increasing traffic congestion, and changing travel patterns to create a network that better serves existing riders, attracts new riders, and better meets regional needs with changes to route design, frequency of service, span of service, stop spacing, and coverage area. The goal of the RailVision initiative is to identify cost-effective strategies to transform

⁷ Email from Andrew Brennan (MBTA) sent 2/26/21 to Erin Flaherty (MEPA Office)

the existing Commuter Rail system into one that better supports improved mobility and economic competitiveness in Greater Boston. One such strategy is advancing a regional rail approach which will provide more flexible options for riders as ridership patterns continue to evolve after the pandemic such as reducing the number of trains during peak periods and increasing midday trains to provide more regularly scheduled service to provide flexibility and to meet commuters needs. As described below in greater detail, the MBTA will conduct another equity analysis within a year from now (March 2022) or sooner and compare it to pre-COVID service levels with the intent of providing a service at the end of the recovery that will be more equitable than before COVID (as measured by percent of service hours serving minority and low income populations).⁸

The ENF indicated that the MBTA will continue to provide the public and riders with information on how service is built back as well as opportunities to provide input on the process. These opportunities will include:

- Gathering public feedback through the MBTA's quarterly and bi-yearly service change process.
- Collecting feedback on the Bus Network Redesign and RailVision transformation projects. This will provide opportunities to submit input on how services should be changed based on changing ridership patterns. An extensive public outreach program will be conducted on Bus Network Redesign over the next several months to obtain feedback to inform how service is returned and/or reallocated.
- Continuing to accept written feedback from riders/municipalities through MBTA Community Engagement team.
- The MBTA will continue to engage communities in multiple languages through all of these initiatives, including Coffee Chats with MBTA Community Engagement staff which occur in English, Spanish and Chinese.

I encourage the MBTA to develop a comprehensive public participation plan to inform and engage stakeholders in future service planning activities with the purpose of maximizing participation and effectiveness.

Air Quality

The ENF included an air quality analysis developed by CTPS' regional travel demand model to develop estimates of emissions of criteria pollutants and GHG. The analysis utilized data from the 2015–17 MBTA System-wide Passenger Survey. Since the travel demand model utilizes data on travel patterns, ridership, and surveys that are not representative of current COVID conditions, a sketch-level planning analysis was used to develop estimates of emissions of criteria pollutants and GHG emissions through summer of 2021. The sketch-level planning analysis involved two scenarios:

Transit Vehicles: Changes in the number of and type of transit vehicles in operation and lower service levels will lead to a decrease in transit vehicle emissions.

⁸ <https://cdn.mbta.com/sites/default/files/2020-12/2020-12-14-fmcb-F-forging-ahead-service-proposal.pdf>

Auto Diversions: Reductions in service levels will lead to reduced ridership and diversions to autos. These diversions will lead to an increase in emissions due to additional auto passenger vehicle-miles of travel (VMT) on the roadways.

The analysis examined a baseline condition of MBTA transit service which was the planned service for Spring 2020 prior to the COVID-19 emergency and compared it to the proposed service plans representing the total service level reductions, which provides a conservative analysis as not all may go into effect. The MBTA service level changes will affect all of the MBTA's transit modes: bus, rapid transit, commuter rail, and ferry. Each mode has a unique set of service changes and impacts to the type of engine technology resulting in different mobile source emissions (*i.e.* emission resulting from combustion engines using fossil fuels) and thus was analyzed separately. Emissions from the stationary sources (*i.e.* electricity used to power electric vehicles and trains) were not included in the analysis because Massachusetts expects to use clean power sources and changes to the rapid transit system will not have any significant impact on emissions due to the clean energy sources.

The bus analysis quantified the change in revenue-miles (*i.e.*, the total mileage that MBTA passenger vehicles are available to customers) by engine technology for the bus routes that are changing. Four bus technology types were examined: diesel fuel buses (mobile source); compressed natural gas buses (mobile source); hybrid buses (mobile source); and electric buses (stationary). Rapid transit vehicles obtain their power from either a third rail or catenary (*i.e.* overhead line) that is fed from a stationary source. For commuter rail vehicles (*i.e.* locomotives), the analysis assumed that the MBTA would remove the older and most polluting locomotives when it reduced service levels. To account for the effects of selectively removing the older locomotives, the emission rate factors used for the remaining commuter rail locomotives were scaled down by five percent. For ferry service, data on revenue mileage for planned Spring 2020 and Spring 2021 schedules were matched to emission rates developed specifically for the boat types and engine power serving these routes.

To estimate the reduction in emissions resulting from reducing transit VMTs, the change in miles traveled by technology type was multiplied by the emission factors associated with each transit vehicle type. An estimate was then developed of the number of riders who would choose to travel by auto because of the proposed service level changes and average trip lengths were estimated to determine VMT. These new auto VMT were multiplied by the corresponding emissions factors to develop an estimate of the increase in emissions resulting from auto diversions. These values were combined to derive the net effect on regional emissions. The emissions were estimated for four pollutants including one GHG: volatile organic compounds (VOCs), nitrogen oxides (NO_x), carbon monoxide (CO), particulate matter (PM), and carbon dioxide (CO₂). The following table provides a summary of annualized regional air quality impacts (in kilograms (kg)).

	VOCs	NO _x	CO	CO ₂	PM
Base emissions: Spring 2020	13,096	202,485	240,713	258,814,415	6,297
Forging Ahead emissions: Summer 2021	11,334	138,669	232,537	202,238,758	4,158
Net air quality impacts	-1,762	-63,817	-8,176	-56,575,657	-2,138

Decrease in transit VMT	-2,269	-63,961	-42,001	-62,374,095	-2,222
Increase in auto VMT	508	144	33,825	5,798,438	84
Percent change	-13%	-32%	-3%	-22%	-34%

As seen in the table, the decrease in transit VMTs is significantly greater than the increase in auto VMTs that will result from a limited number of auto diversions resulting from service level reductions, which will produce an estimated net reduction of emissions for the five identified pollutants. I note that numerous comment letters identified concerns about the limited time frame of air quality analysis (*i.e.* July 2021), specifically in light of the continued opening of the Commonwealth which may result in additional traffic and associated air quality impacts. Additionally, comment letters identify concerns regarding the potential long-term impact on GHG emissions that could result from the permanent mode shift as a result of the reductions. While I acknowledge these concerns and also recognize the limitations on ridership projections in light of the potential long-term impact the pandemic will have on rider behavior and transportation patterns in general, I expect the MBTA will revisit the air quality analyses to confirm assumptions used for the *Forging Ahead* initiative. I encourage the MBTA to submit follow up air quality data after service level reductions have been implemented and/or adjusted and ridership changes.

Environmental Justice Analysis

As a recipient of federal funds through the Federal Transit Administration (FTA), the MBTA is required to comply with Title VI of the Civil Rights Act of 1964 (Title 49, part 21, Code of Federal Regulations). Compliance with Title VI obligations includes a requirement for large transit providers to conduct a Title VI service equity analysis to evaluate, prior to implementing any major service change, whether the planned change would have a discriminatory impact on the basis of race, color, or national origin. Although low-income populations are not a protected class under Title VI, the FTA also requires transit providers to determine whether low-income populations would bear a disproportionate burden from a proposed major service reduction. A full Title VI analysis to satisfy this federal obligation was completed on March 3, 2021 and provided to the MEPA Office on March 8, 2021. As described below, the Title VI analysis concludes that the service level adjustments will not result in disparate impacts on minority and/or disproportionate burdens on low-income populations.

While the project does not exceed MEPA review thresholds that trigger implementation of the Executive Office of Energy and Environmental Affairs' (EEA) Environmental Justice (EJ) Policy, the ENF included an equity analysis developed in accordance with the MBTA's Disparate Impact/Disproportionate Burden (DI/DB) Policy (2017)⁹. The DI/DB Policy satisfies the FTA's requirement under Title VI to evaluate, prior to implementation, any and all service changes that exceed the MBTA's major service change threshold to determine whether those changes may have a discriminatory impact based on the finding of an adverse effect linked to race, color, or national origin, and/or a disproportionate burden, based on the finding of an adverse effect linked to minority or low-income status. The MBTA defines adverse effects of service changes as changes to:

⁹ The DI/DB Policy can be found at the following link: <https://www.mbta.com/policies/fair-service-fair-fares>

- For routes with at least 80 service hours per week, an increase or decrease in the amount of service scheduled, by route and by mode (as measured by changes to weekly revenue vehicle hours (i.e service hours)
- An increase or decrease in the access to service, by route (as measured by changes to route length, in miles)

The MBTA's threshold for determining when adverse effects of major service changes may result in disparate impacts on minority and/or disproportionate burdens on low-income populations is 20 percent. If the ratio of the impact on minority to non-minority populations or low-income to non-low-income populations is more than 1.20 (or 120 percent), then the proposed change would be determined to pose a potential disparate impact or disproportionate burden. The equity analysis makes the conservative assumption that all service level reductions go into effect at once.

The equity analysis also used the 2015–17 MBTA Systemwide Passenger Survey dataset. The equity analysis indicated that this dataset was used instead of the U.S. Census Bureau's American Community Survey and U.S. Census data because the vast majority of the changes the MBTA is proposing are changes to service levels rather than route structure. Minority status was determined based on the answers to the race and ethnicity survey questions. The systemwide survey minority percentage was 34 percent. Low-income status was determined for respondents who provided their household income. Household incomes of less than \$43,500 were classified as low income. The systemwide survey low-income percentage was 29 percent. The equity analysis acknowledged that the impact of the COVID-19 pandemic on ridership varies by demographics and mode and that the 2015–17 MBTA Systemwide Passenger Survey data describes pre-pandemic rider demographics and may no longer be representative of current riders. To address this issue, the demographics of riders on each route were assigned in two ways. The first method ("proportionate allocation") used demographic data directly from the survey and allocates a metric (service hours or route-miles) by the percent of a demographic by route. The second method ("full allocation") assigns each route a classification based on whether it is above or below the systemwide average for each demographic. All of a given metric is attributed to the group. As described in the ENF, the proportionate allocation method allows the allocation of route metrics to vary between routes and more precisely captures each route's unique demographic profile. As described in the ENF, this method is limited by the, likely false, assumption that the COVID-19 pandemic has not significantly altered rider demographics since the survey was conducted. The ENF indicates that the full allocation method addresses this limitation by acknowledging that while the precise demographics of current riders are unknown, route classifications are likely to remain stable. According to the ENF, most pre-COVID low-income and minority routes probably remain low-income and minority routes post-COVID. As described in the ENF, this method sacrifices some precision regarding the demographic variation within low-income and minority routes, but is likely a better representation of reality.

Consistent with the MBTA's DI/DB Policy, the analysis analyzed the changes to service hours as relative (percent net change) and absolute (change in service hours) and measured the relative share of the burden, which compares the protected population group's share of the net benefit or burden relative to its existing share of the metric. As described in the analysis, the ratio of relative impacts on minority populations and low-income populations were less than 120 percent under both the proportionate methodology and the full allocation method.

The analysis provided in the ENF primarily focused on impacts to service hours and not route

length because CTPS was unable to accurately model systemwide route length changes and therefore only identify outright route eliminations. These impacts were further refined in the formal Title VI service equity analysis which was finalized during the MEPA review period, submitted as supplemental information, and presented at the FMCB meeting on March 8, 2021.¹⁰ The updated calculations provided in the formal Title VI analysis were based on more complete data (i.e. the total existing route miles and total change in route miles) and provided data on the percent share of lost service hours and route miles for minority and low-income populations for the proportionate and full allocation methodologies. As stated in the analysis, under both methodologies the proposed changes to service hours and route miles do not indicate a disparate impact to nonminority populations or a disproportionate burden to non-low-income populations. For example, the percent share of net changes to both metrics were below the percent share of total service hours and route miles for minority and low-income populations.

I received several comment letters which identify a concern that the analysis focused on the aggregate impacts of service cuts as opposed to the route level, which may understate impacts to environmental justice populations. However, as required in the DI/DB Policy, the equity analysis must consider all concurrently proposed changes in the aggregate. Additionally, as described above, the framework developed by the MBTA to determine the service level reductions was focused on maintaining service for transit critical populations which include low-income households, communities of color, the disabled, households who have few or no cars, and elderly populations. I encourage the MBTA to continue to consider route level impacts to EJ populations, particularly for suspension/elimination of service. The MBTA will conduct another equity analysis within a year and compare it to pre-COVID service levels with the intent of providing service at the end of the recovery that will be more equitable than before COVID (as measured by percent of service hours serving minority and low-income populations).

Conclusion

The ENF has adequately described and analyzed the project and its alternatives, and assessed its potential environmental impacts and mitigation measures. Based on review of the ENF and comments received on it, I have determined that an EIR is not required.

K. Theoharides

March 12, 2021

Date

Kathleen A. Theoharides

Comments received:

2/23/2021 Richard Gates
2/24/2021 Conrad Ciszek
2/24/2021 Helen Cox

2/24/2021 Rosaria Salerno
2/26/2021 George Draper
2/26/2021 Marie Fukuda

¹⁰ The formal Title VI service equity analysis and March 8, 2021 FMCB presentation were provided to the MEPA office on March 8, 2021.

2/27/2021	John Bookston	3/2/2021	Alison Pultinas
3/1/2021	Brenda Lew	3/2/2021	Angela Weiland
3/2/2021	Kim White-Sawczynec	3/2/2021	Anne Van Nostrand
3/2/2021	Kristen Mobilia	3/2/2021	Boston City Councilor
3/2/2021	Laura Sher		Kenzie Bok
3/2/2021	Luisa Harris	3/2/2021	Brian Langevin
3/2/2021	Martyn Roetter	3/2/2021	Brittany Baker
3/2/2021	Mary Farrell	3/2/2021	Cecilia Nardi
3/2/2021	Mary Fitzsimmons	3/2/2021	Charles Martel
3/2/2021	Maryanne O'Malley	3/2/2021	Christopher Cullity
3/2/2021	Matti Kniva Spencer	3/2/2021	City of Cambridge
3/2/2021	Michael Pizziferri	3/2/2021	City of Somerville
3/2/2021	Morta	3/2/2021	Conservation Law Foundation (CLF)
3/2/2021	Nancy Gertner	3/2/2021	Daniel Krulewitch
3/2/2021	Nancy Reynolds	3/2/2021	Dave Gold
3/2/2021	Nikki Flionis	3/2/2021	Elaine King
3/2/2021	Priscilla Claman	3/2/2021	Erica
3/2/2021	Randall Albright	3/2/2021	GreenRoots
3/2/2021	Rebecca G Mulzer	3/2/2021	Harvard Board of Health
3/2/2021	Robert Roppolo (2)	3/2/2021	Helene Woodvine
3/2/2021	Robert Roppolo	3/2/2021	Jacqueline Royce
3/2/2021	Robert VandenBerge	3/2/2021	James Berkman
3/2/2021	Ruth E Khowais	3/2/2021	Jane Kelley (2)
3/2/2021	Sarah Jenness	3/2/2021	Jane Kelley
3/2/2021	Sonya Bhabhalia	3/2/2021	Kara Verrochi
3/2/2021	Sylvia Welsh	3/2/2021	Karen Cord Taylor
3/2/2021	Tim Horn	3/3/2021	Tracey L Hunt
3/2/2021	Vicki Smith	3/3/2021	Lynd Matt
3/2/2021	Weston Residents care of Sandrah Kendall	3/3/2021	Patricia Harriell
3/2/2021	Robert Houle	3/3/2021	Steve Wolf
3/2/2021	A Better City	3/3/2021	Steven Gallanter
3/2/2021	Abington Planning Board	3/3/2021	Ed Ballo
		3/3/2021	Megan Schwenke
		3/4/2021	Emma Muthemba

KAT/EFF/eff

From: [Richard Gates](#)
To: [Flaherty, Erin \(EEA\)](#)
Subject: EEA project number (#16324)
Date: Tuesday, February 23, 2021 5:47:01 PM

CAUTION: This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

I am writing to express my deep concern over the the proposal to terminate the bus #55 service,

Over the last 10 years, the population in the West Fenway has greatly increased with several new high-rise residence, with MORE planned. Additionally, there are quite a few seniors and handicapped citizens for whom the #55 is critical to meeting their daily concerns.

While ridership may be down, it is essential to provide the #55 service – even if it is just from Queensberry to Copley; otherwise, the only alternative is to walk to the Fenway stop on the Greenline or to the Hynes, which is not only an inconvenience, but for some, an impossibility.

We want to lessen the carbon footprint in Boston; yet, looking at Boylston Street over the past 10 years, it is a virtual “parking lot” with so many vehicles. We should be encouraging and advocating for public transportation – leaving every 30 minute, NOT every 60 minutes, which could easily cause low ridership because its schedule isn’t practical or feasible to meet the needs of Fenway ridership.

The lack of dedication to this route, apparent by its infrequent schedule and time gap, along with the fact that the bench in the bus shelter at the corner of Queensberry and Jersey already being removed, indicates a lack of commitment and low interest, on the part of the MBTA, to keep the #55 as a vital and environmentally-friendly option. I strongly disagree with this and urgently implore you to retain the #55 bus service. It is essential!!

Richard Gates

Sent from [Mail](#) for Windows 10

From: [Conrad Ciszek](#)
To: [Helen Cox](#); [Flaherty, Erin \(EEA\)](#); [MEPA \(EEA\)](#); [horn@aol.com](#)
Cc: [william.brownsberger@masenate.gov](#); [jon.santiago@mahouse.gov](#); [chynah.tyler@mahouse.gov](#); [jay.livingstone@mahouse.gov](#); [kenzie.bok@boston.gov](#); [kim.janey@boston.gov](#); [michael.f.flaherty@boston.gov](#); [michelle.wu@boston.gov](#); [julia.mejia@boston.gov](#); [a.e.george@boston.gov](#); [richardgiordano@fenwaycdc.org](#); [Jaya Aiyer](#); [Holly Berry](#); [Brenda Lew](#); [brendalew107@msn.com](#); [Kathy Greenough](#); [Mathew Thall](#); [Matt Wu](#); [Azmon, Cory L. \(HOU\)](#); [Lloyd Alfonso](#); [Robert Case](#)
Subject: Re: EEA Project # 16324.....# 55 Queensberry Bus AKA Lifeline for workers & Fenway seniors
Date: Wednesday, February 24, 2021 3:47:12 AM
Attachments: [Screenshot_20201005-205433.png](#)

CAUTION: This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Dear Ms. Flaherty:

I am writing to you today to concur with the comments made previously forwarded to you by fellow Fenway resident, Ms. Helen Cox. I too would like to request that the MBTA reconsider the elimination of this critical transportation line for the West and East Fenway residents.

The 55 bus represents an important lifeline for many of the elderly, disabled and virtually all residents of the East and West Fenway neighborhoods. The route provides an important linkage between the East and West Fenway along with other neighborhoods of Boston inclusive of Back Bay and the South End with transit connections to many other critical destinations.

Many of the residences of the West Fenway are not within an immediate approximate walking distance of any subway line or other major bus route. As Helen stated, there are numerous senior citizen housing developments that are located in the West Fenway that are not within a walkable proximity to an MBTA subway station or other major bus route. The 55 bus provides a critical linkage to other points within the city of Boston.

Already, the discontinuance of the 55 bus serving downtown Boston during the weekdays and middays effective last fall has also been a tremendous disservice for the seniors and other residents who at one time enjoyed a single door-to-door ride from their home to important retail and medical appointments in the downtown area without the burden of transfer. The discontinuance of service to downtown Boston has not only provided a disservice for these residents, but for many other residents comprising of students and young professionals who commute between and from the East and West Fenway to other neighborhoods for work and study. This is a vital service particularly in winter months when it's cold or joint inclement weather when walking is not a viable option.

The complete elimination of the 55 bus would be a tremendous disservice not just to the seniors and disabled residents, but also to many of the newly arriving residents in the East and west Fenway prompted by the new developments. Retailers comprising of large chains and small business sole proprietorships would also be adversely affected as the 55 bus serves many of these retailers right outside their doors.

In addition, once the pandemic has concluded and baseball fans begin returning to the ballpark, the 55 bus provides a significant alternative and supplement to an already overcrowded and congested green line on game days and during other special events.

As Helen said, you cannot base a major transportation decision on current ridership figures. Please be mindful that this is a pandemic and virtually the entire MBTA system has experienced a significant decline in ridership. I have first-hand seen many Green Line trolley cars, and other major bus routes local and Express buses running empty for the past year. For instance, I see many 39 accordion buses running empty or with one or two passengers numerous times daily. I've also seen many number one buses on Mass Avenue riding empty or having just a few riders. However, there is no mention of eliminating those particular routes or eliminating the green line service. These low ridership figures are not permanent but are only temporary because of the pandemic similarly to what is taking place with the 55 bus. Once the pandemic is over the ridership will once again rebound not just for the 55 but for virtually all routes.

The 55 bus is a miniscule expenditure. The bus does not require a significant amount of funding or resources to operate as it usually comprises of only just one bus, one bus driver and it's short route does not utilize a great deal of fuel. This is far less expensive than the numerous 39 accordion buses and one buses and express buses running on the turnpike that are completely empty or have minimal passenger riders. Thus the elimination of a single bus operation that is critical for a neighborhood and critical for the neighborhoods' resurgence following the pandemic. How can these neighborhoods recover or their businesses recover if public transportation linkages are eliminated and no longer exist?

Thus, please refrain from eliminating the 55 bus. Once the pandemic is over and schools return to in-person learning and tourists and visitors return to the Fenway They will be an increase in ridership Not just for the 55 bus but also for other routes such as the one and the 39 and other bus routes currently experiencing low ridership. Also, many of the residents will avoid a hardship of losing a vital transportation link.

For the record, I have attached a copy of an op-ed that I wrote for the Fenway news last fall expressing this viewpoint. Also, the screenshot comprises of letters from our elected officials also speaking against the elimination or reduction of the 55 bus service. Thank you for your consideration.

Sincerely,

Conrad
Ciszek

East Fenway Resident

FENWAY NEWS | OCTOBER 2020 | 7

TRANSPWOES!

Recent MBTA decisions to cut service on the 55 bus route and move a bus stop on Mass. Ave. both took place without community input. The changes—and lack of public process—have riled many Fenwickians. *The Fenway News* publishes letters and an essay reflecting residents' concerns.

Open Letter: Sited With No Community Input, New Bus Shelter Poses Health Risks

DEAR COUNCILOR BOK,

We write you on behalf of the First Fenway Cooperative, 143-149 Mass. Ave. in the Fenway, a limited-equity housing cooperative with 12 units. Our building has commercial units on the ground floor and residential units above. In 2019, we paid \$122,625.52 in real estate taxes to Boston.

As you are well aware, our shelter has been built on the sidewalk just next to our apartments, near the corner of Mass. Ave. and Boylston. We were not provided with any notice about this decision. We believe this location is extremely ill-advised and will result in significant pedestrian congestion [the shelter leaves little sidewalk room at one of the busiest pedestrian spaces in Boston]. The shelter serves bus line #1, one of the 15 busiest bus lines operated by



The new bus shelter at Mass. Ave. and Boylston Street. windows are not sealed like those in homeless, often struggling with

neighborhood is undergoing rapid change, with the Samuels project beginning near the site of Hynes Green Line station, proximate to our 1894 Arthur Vinal [designed] building.

This construction will have consequential disruptions regarding noise, pedestrian and vehicular traffic, air quality, commercial curtailment, physical effects on nearby buildings, and infestation.

We are writing because a bus

the MBTA. It will promote air pollution and noise for our nearby apartments as buses stop, idle while loading [large numbers of people will wait for the bus here after walking over from the Green Line], and then accelerate to depart. Studies confirm an increase in air pollution near bus stops, and exhaust is particularly dangerous to health. The noise of buses braking and accelerating also contributes to ill health. Our building is not a high-rise, and our

newer buildings.

We were not contacted about this significant change prior to the bus stop's being used, and we strongly object to this siting.

We suggest that a much more preferable site for this bus stop is on Mass. Ave at Newbury Street. There is less residential impact, less pedestrian congestion, and the walk to and from the Green Line to the bus is shorter.

Finally, individuals who are

problems such as substance use disorder, gather at the bus stop due to the lack of services and support.

We appreciate your assistance in bringing about a reconsideration, and, in the absence of a reversal, a meeting with the appropriate parties to discuss this decision.

[SIGNED] BOB CASE, OSLA DEFIGUEIREDO-CASE, PATRICIA HARRIELL, YVONNE HORNE, JOANNE MCKENNA, JOHN PETER, KARLA RIDEOUT, ROSARIA SALERNO, AND JESSICA SORKIN

Route 55 Represents a Lifeline for Residents, Businesses

BY CONRAD CISZEK

The MBTA 55 bus route is a vital lifeline and link to residents and visitors to the West Fenway, East Fenway, Back Bay, Bay Village, Beacon Hill, and Downtown Crossing neighborhoods of Boston. Most notably,

GUEST OPINION

the route is a link between the West and East portions of the Fenway. Many West and East Fenway residents utilize this bus route as a shuttle between the corner points of their neighborhood district to patronize businesses, attend medical appointments, and to make transportation connections to other local destination points and beyond.

While the East and West Fenway neigh-

borhoods may be viewed as in close proximity, making them walkable, many elderly and disabled residents may be unable to walk this distance. Moreover, many residents—regardless of age, agility, and health condition—rely on the bus route during inclement weather or to assist in carrying bundles accumulated from shopping in these respective areas. In fact, there are many instances where despite my fortunate health condition and capacity to walk, I have utilized this bus to transport myself and my accumulated packages and during periods of inclement weather.

When my late mother used to visit me, we would always take the 55 bus to patronize the movies, restaurants, and shops in the West Fenway or to go and from points in downtown Boston or Copley Square. Given her age and

health, she was unable to walk to the West Fenway, and the 55 bus served her visits well. Without the 55 bus, neither she nor I would have been able to benefit from the products and services of the small and large businesses in the West Fenway and other neighborhoods and they would have lost valuable business.

I was quite appalled to learn of the abrupt service reductions to the 55 bus, which I read about in a newspaper. There was no notice! There was no consultation of the residents of these neighborhoods, nor was there an invitation for community meetings for input! Why did the MBTA feel that they did not need to consult nor include the community in this decision?

The bizarre reduction of evening and midday service along with services to downtown Boston provide a tremendous disservice to residents and visitors and employees who live, work, and patronize these neighborhoods. Residents in the East and West Fenway utilize the 55 bus to commute to Copley Square or Downtown Crossing as it is an alternative to walking up and down the stairs and the other difficulties they may be subjected to using the Green Line. The 55 bus provides a one-stop ride from the West Fenway connecting it to many vital neighborhoods in the city and to downtown Boston. Many elderly and disabled prefer the 55 bus, as it is a much easier option of transportation.

The abrupt service cut provides not only a disservice to the residents of these neighborhoods, but also to many businesses

small and large and their employees situated in the West and East Fenway and adjacent neighborhoods. All of these stakeholders will be subjected to irreparable harm through the reduction of service, which will result in reduced traffic, patronage, and utilization of the products and services of the retailers in these neighborhoods. Businesses already negatively impacted by the pandemic will only be harmed further by these service cuts.

While the MBTA claims to be suffering hardships due to the economic downturn and the pandemic, it could hardly be stated that the continued operation of the 55 bus for a couple of hours in the evening and on weekdays and extending it to serve downtown represents a significant expenditure. The 55 bus under the previous schedule format comprised of one bus, one driver, and a minimal level of fuel.

I believe wholeheartedly that the MBTA has inflicted significant unnecessary harm on members of these neighborhoods for what are minuscule cost savings. Moreover, I believe that there are many other areas of operations and services that the MBTA could examine in its quest to reduce its costs. The 55 bus is a minuscule expenditure, but it is a vital service that many rely on. Therefore, I encourage fellow residents to contact the MBTA to let them know that you would like to see this service restored! Last, I encourage the MBTA to restore the 55 to its previous service levels and look elsewhere for cost reductions.

Conrad Ciszek lives in the East Fens.



Virtual Public Meeting

Simmons University 2019 IMP Projects

Monday, October 5
6:30 - 8:00 PM

Zoom Link: bit.ly/3kdc9PI
Toll Free: (833) 568 - 8864
Meeting ID: 161 266 4061

Project Proponent:
Simmons University

Project Description:

Virtual meeting of the Longwood Medical Area Forum to discuss the Simmons University IMP Projects, including the mixed-use Living and Learning Center project.

This meeting will be held using Zoom. Members of the public are encouraged to attend.

mail to: **Edward Carmody**
Boston Planning & Development Agency
One City Hall Square, 9th Floor
Boston, MA 02201
phone: 617.918.4422
email: edward.carmody@boston.gov

Close of Comment
Period:
10.14.2020

BostonPlans.org | @BostonPlans
Teresa Pofhamus, Executive Director/Secretary

LETTER TO MBTA GEN. MANAGER STEVE POFTAK

Thank you for all your work in the Commonwealth during these difficult times. Our transportation system is faced with significant challenges in terms of resources, funding, and capacity—all of which have been exacerbated during COVID-19.

We write to you as concerned elected officials who have been made aware of recent cuts to MBTA bus #55 which are likely to have a detrimental effect on some of our most vulnerable communities. The #55 bus is a lifeline to many disabled and elderly folks living in the Fenway. Many utilize the #55 bus's convenient route to do their daily food shopping, get to doctor's appointments, or run other essential errands.

Prior to these cuts, the #55 bus would run all day, providing a safe, convenient, and accessible method of transportation for senior citizens and other residents of the Fenway. Our constituents were able to ride the #55 bus at any time of day, avoiding crowded peak times to protect themselves from potential COVID-19 infection.

These service cuts may lead to overcrowding of the #55 bus during peak hours, creating a heightened risk of infection. This harms our elderly and disabled constituents who are most at risk for contracting the disease.

Unfortunately, alternative forms of transportation are not viable for many folks in this population. For many in the West Fenway, Kenmore Square is too far to get to, preventing access to alternative bus routes or accessing the subway. Additionally, constituents have reported difficult accessing The Ride, citing long wait times, a shortage of drivers, and safety concerns regarding the pandemic.

We respectfully request that you reconsider the #55 bus schedule change and re-institute the previous, full-day schedule.

We are also eager to work with you around how to mitigate the aspects of the changes that are having the hardest impacts. Our public transit network should be prioritizing our elderly and vulnerable riders.

[SIGNED] WILL BROWNSBERGER, STATE SENATOR; JON SANTIAGO, STATE REPRESENTATIVE; KENZIE BOK, BOSTON CITY COUNCILOR



To Our Mission Hill and Fenway Neighbors:

The five Colleges of the Fenway (COE) have been your neighbors for almost 900 years. We have been through thick

[Sent from Yahoo Mail on Android](#)

On Wed, Feb 24, 2021 at 2:35 AM, Helen Cox
<coxhelen@aol.com> wrote:

Dear Erin:

.....I was heartbroken when I first heard that the MBTA was thinking of cutting out or cutting back services for the #55 Queensberry bus which travels from the West Fens to Park Street Station except on weekends when it just goes to Copley Square. I recall back in the '70's, '80's & '90's when I took the bus twice a day, 7 days a week to my job downtown.....generally the bus was packed from 7 to 10 & from 12 to 2pm & packed again from 3:30 to 7pm often with standing room only with people going to work both downtown and to Copley Square & people with medical or medical-related jobs coming from downtown to work at the 5 or 6 hospitals in the Longwood medical area or later in the morning with people going to the 6 or 7 schools & colleges in the West Fens area.....and when there was a ballgame or concert at Fenway Park, the bus was jammed.

.....It wld be unwise for the MBTA to base frequency of travel on the Queensberry bus on the statistics available today during a pandemic when many places of employment, education & culture are closed & not to consider what will begin to happen as soon as businesses, colleges, schools, museums & restaurants begin to open up, not to mention Fenway Park as is expected to happen very soon according to Governor Baker and the Legislature as the pandemic begins to wind down.

Already, according to Governor Baker, we have begun to see the Covid numbers beginning to drop so that in 3 to 4 months, people taking the #55 bus will begin to increase concurrently.....as Covid cases begin to drop as vaccinations increase.

.....We, the members of the Fenway Civic Assoc, the Fenway CDC, the Fenway Community Center, the Peterboro Senior Center, the Fenway Garden Society, the Friends of the Muddy River, and the Friends of Ramler Park, do not want to have to come to the table together with our State Senator, our 3 State Reps, our 5 Boston City Councilors to renegotiate this issue with the MBTA as our businesses, restaurants, schools, colleges, etc begin to open up & riders on the #55 bus begin to increase exponentially

.....In view of this, I urge you to think carefully, before you begin to plan any service cutbacks for the #55 Queensberry bus...thank you.....

Sincerely,
Helen Cox,
11 Park Drive #22
Boston, MA 02215

CC: President Fenway Civic Assoc, Fenway CDC, Fenway Garden Assoc, Fenway Community Center, Friends Ramler Park, Friends of the Muddy River, the Peterborough Senior Center, Senator Wm Brownsberger, State Reps Jon Santiago, Chynah Tyler, Jay Livingstone, Boston City Councilors Kenzie Bok, Kim Janey, Anissa Essabi-George, Michael Flaherty, Michelle Wu

PS: it shld be noted that the West Fens contains 4 subsidized complexes representing at least 3 to 400 seniors & disabled individuals, most, if not all, are low income and many not readily ambulatory. Walking to the subway or walking to the postoffice in the East Fens wld be out of the question. Thus, the 55 Queensberry bus for them, is truly a lifeline.

1

From: [Helen Cox](#)
To: [Flaherty, Erin \(EEA\); MEPA \(EEA\); horn@aol.com](#)
Cc: [william.brownsberger@masenate.gov](#); [jon.santiago@mahouse.gov](#); [chynah.tyler@mahouse.gov](#); [jay.livingstone@mahouse.gov](#); [kenzie.bok@boston.gov](#); [kim.janey@boston.gov](#); [michael.f.flaherty@boston.gov](#); [michelle.wu@boston.gov](#); [julia.mejia@boston.gov](#); [a.e.george@boston.gov](#)
Subject: EEA Project # 16324.....# 55 Queensberry Bus AKA Lifeline for workers & Fenway seniors
Date: Wednesday, February 24, 2021 2:35:38 AM

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Dear Erin:

.....I was heartbroken when I first heard that the MBTA was thinking of cutting out or cutting back services for the #55 Queensberry bus which travels from the West Fens to Park Street Station except on weekends when it just goes to Copley Square. I recall back in the '70's, '80's & '90's when I took the bus twice a day, 7 days a week to my job downtown.....generally the bus was packed from 7 to 10 & from 12 to 2pm & packed again from 3:30 to 7pm often with standing room only with people going to work both downtown and to Copley Square & people with medical or medical-related jobs coming from downtown to work at the 5 or 6 hospitals in the Longwood medical area or later in the morning with people going to the 6 or 7 schools & colleges in the West Fens area.....and when there was a ballgame or concert at Fenway Park, the bus was jammed.

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.....We, the members of the Fenway Civic Assoc, the Fenway CDC, the Fenway Community Center, the Peterboro Senior Center, the Fenway Garden Society, the Friends of the Muddy River, and the Friends of Ramler Park, do not want to have to come to the table together with our State Senator, our 3 State Reps, our 5 Boston City Councilors to renegotiate this issue with the MBTA as our businesses, restaurants, schools, colleges, etc begin to open up & riders on the #55 bus begin to increase exponentially

.....In view of this, I urge you to think carefully, before you begin to plan any service cutbacks for the # 55 Queensberry bus...thank you.....

Sincerely,
Helen Cox,
11 Park Drive #22
Boston, MA 02215

CC: President Fenway Civic Assoc, Fenway CDC, Fenway Garden Assoc, Fenway Community Center, Friends Ramler Park, Friends of the Muddy River, the Peterborough Senior Center, Senator Wm Brownsberger, State Reps Jon Santiago, Chynah Tyler, Jay Livingstone, Boston City Councilors Kenzie Bok, Kim Janey, Anissa Essabi-George, Michael Flaherty, Michelle Wu

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From: [Rosaria Salerno](#)
To: [Helen Cox](#)
Cc: [Flaherty, Erin \(EEA\)](#); [MEPA \(EEA\)](#); [horn@aol.com](#); [william.brownsberger@masenate.gov](#); [jon.santiago@mahouse.gov](#); [chynah.tyler@mahouse.gov](#); [jay.livingstone@mahouse.gov](#); [kenzie.bok@boston.gov](#); [kim.janey@boston.gov](#); [michael.f.flaherty@boston.gov](#); [michelle.wu@boston.gov](#); [julia.mejia@boston.gov](#); [a.e.george@boston.gov](#)
Subject: Re: EEA Project # 16324.....# 55 Queensberry Bus AKA Lifeline for workers & Fenway seniors
Date: Wednesday, February 24, 2021 8:35:47 AM

CAUTION: This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Well said, Helen!

The #55 is essential to residents of the Fenway....East and West.

Risaria

Sent from my iPhone

On Feb 24, 2021, at 2:35 AM, Helen Cox <coxhelen@aol.com> wrote:

Dear Erin:

.....I was heartbroken when I first heard that the MBTA was thinking of cutting out or cutting back services for the #55 Queensberry bus which travels from the West Fens to Park Street Station except on weekends when it just goes to Copley Square. I recall back in the '70's, '80's & '90's when I took the bus twice a day, 7 days a week to my job downtown.....generally the bus was packed from 7 to 10 & from 12 to 2pm & packed again from 3:30 to 7pm often with standing room only with people going to work both downtown and to Copley Square & people with medical or medical-related jobs coming from downtown to work at the 5 or 6 hospitals in the Longwood medical area or later in the morning with people going to the 6 or 7 schools & colleges in the West Fens area.....and when there was a ballgame or concert at Fenway Park, the bus was jammed.

.....It wld be unwise for the MBTA to base frequency of travel on the Queensberry bus on the statistics available today during a pandemic when many places of employment, education & culture are closed & not to consider what will begin to happen as soon as businesses, colleges, schools, museums & restaurants begin to open up, not to mention Fenway Park as is expected to happen very soon according to Governor Baker and the Legislature as the pandemic begins to wind down. Already, according to Governor Baker, we have begun to see the Covid numbers beginning to drop so that in 3 to 4 months, people taking the #55 bus will begin to increase concurrently.....as Covid cases begin to drop as vaccinations increase.

.....We, the members of the Fenway Civic Assoc, the Fenway CDC, the Fenway Community Center, the Petererboro Senior Center, the Fenway Garden Society, the Friends of the Muddy River, and the Friends of Ramler Park, do not want to have to come to the table together with our State Senator, our 3 State Reps, our 5 Boston City Councilors to renegotiate this issue with the MBTA as our businesses, restaurants, schools, colleges, etc begin to open up & riders on the #55 bus begin to increase exponentially

.....In view of this, I urge you to think carefully, before you begin to plan any service cutbacks for the # 55 Queensberry bus...thank you.....

Sincerely,
Helen Cox,
11 Park Drive #22
Boston, MA 02215

CC: President Fenway Civic Assoc, Fenway CDC, Fenway Garden Assoc, Fenway Community Center, Friends Ramler Park, Friends of the Muddy River, the Peterborough Senior Center,
Senator Wm Brownsberger, State Reps Jon Santiago, Chynah Tyler, Jay Livingstone, Boston City Councillors Kenzie Bok, Kim Janey, Anissa Essabi-George, Michael Flaherty, Michelle Wu

PS: it shld be noted that the West Fens contains 4 subsidized complexes representing at least 3 to 400 seniors & disabled individuals, most, if not all, are low income and many not readily ambulatory. Walking to the subway or walking to the postoffice in the East Fens wld be out of the question. Thus, the 55 Queensberry bus for them, is truly a lifeline.

From: [George Draper](#)
To: [Flaherty, Erin \(EEA\)](#)
Subject: EEA Project #116324
Date: Friday, February 26, 2021 10:26:06 AM

CAUTION: This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Dear Ms. Flaherty,

I have written before to mass.gov protesting the elimination of bus #55, but I want to make a final plea to you personally before the March 2 deadline.

This bus is crucial to the lives of many Fenway residents, especially those who, like me, live on the Park Drive side of Fenway. It is really the only good connection we have to the Boylston T and Park Street on weekdays. Eliminating it would not merely “inconvenience” but significantly disadvantage these local residents, especially those of us who are elderly and have trouble hauling ourselves across the park to the MFA stop or over Mass Ave to Kenmore Square. And once this bus is eliminated, the chances of its being reinstated are, as you know, nil.

Though I understand the need to reduce the cost of public transportation, I feel the city is heading in the wrong direction by reducing bus service in an underserved area of the city, and I urge you to trash this terrible idea!

Sincerely,

George Draper
131 Park Dr. #43, Boston

Sent from my iPad

From: [Fresherfish](#)
To: [Flaherty, Erin \(EEA\)](#)
Cc: kenzie.bok@boston.gov; henry.santana@boston.gov; shanice.pimentel@boston.gov; mayor@boston.gov; andrew.bettinelli@masenate.gov; sherine.aubourg@mahouse.gov; cory.azmon@mahouse.gov; chynah.tyler@mahouse.gov; brandon.iizukarusell@mahouse.gov; jon.santiago@mahouse.gov; william.brownsberger@masenate.gov; iihorn@yahoo.com
Subject: Project #16324
Date: Friday, February 26, 2021 10:20:43 AM
Attachments: [FCA letter MBTA 12.420FinalwithCC.pdf](#)

CAUTION: This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Dear Erin,

I am writing to submit comments on the ENF regarding MBTA service cuts in the Fenway, specifically, the suspension of the #55 bus.

The #55 bus represents a vital connection for Fenway residents to the city - for a community of over 40,000 residents, the elimination of this service will be detrimental on numerous fronts.

The recommendations of the MBTAs advisory board last December stated that there was no budgetary justification for the planned cuts. The cuts of services at a time when COVID-19 vaccines are likely to result in increased ridership will pose hardship for citizens returning to workplaces and other activities. In addition, suspension with no detailed plan to estimate impacts is short sighted and will likely result in permanent injury to communities who rely on these services.

The #55 bus provides needed services in the West Fenway for seniors whose housing was developed to make use of this access. For low income residents and seniors living at St. Cecilia's, Robert McBride House, and in subsidized housing along Peterborough Street, the removal of this service represent loss of access and an environmental justice crisis for vulnerable populations. These populations, some who do not speak English, have not been able to attend meetings that require technology and computers - importantly, there is no plan that incorporates their voice in estimating the need for any return to service in the future.

The West Fenway is underdoing significant development planning, all of which has assumed #55 service as part of transportation plans. To have removal of services with close to 2 million square feet of development that guarantees increased demand on public transit, at a time when public modes of transit are being increasingly promoted in development, further harms the Fenway community and the city's ability to move towards sustainable transportation for residents and visitors.

Please consider these important issues and deny the suspension of the #55 bus line. I am attaching Fenway Civic Association's letter to the MBTA for your record.

Thank you for this opportunity to comment.

Marie Fukuda



Steve Poftak
General Manager, MBTA

Re: *Forging Ahead* plan MBTA Fenway service cuts

December 4, 2020

Manager Poftak,

Fenway Civic Association (FCA) is the Fenway's oldest all-volunteer neighborhood organization that accepts no public or developer funds. Formed in 1961, our mission is to promote a vital and livable neighborhood. We appreciate your leadership and work for the state during challenging times. As civic volunteers, we understand the extreme challenges posed to our community, city, and state that have been exacerbated by the pandemic. Our board is among the vast MBTA ridership now working remotely and we understand the detrimental impacts to the transit system that have ensued.

We are writing to you as community representatives to request your reconsideration of elimination of the #55 bus line, a vital connection for Fenway residents, in the MBTA's *Forging Ahead* plan. Although we appreciate the work the MBTA has undertaken to retain 85% of its bus services, we represent the 15% that are now facing complete elimination of our bus line. For a community of 40,000+ residents representing a part of the city that has been a significant driver of tax revenue for the state, we feel such treatment is highly unfair. Our comments on this decision are as follows:

- 1. Elimination impacts highly vulnerable populations:** The West Fenway is host to a large senior constituency including St. Cecilia House and the Peterborough Senior Center. These community members cannot walk ¼ mile to the nearest train or commuter stop; moreover, the #55 route has been relied on to provide regular and efficient transit to the nearest library and other services; these resources were developed with the bus line in mind. The availability of a local bus service that provides accessible alternatives to seniors, especially when contrasted to a green line service with pressure from Fenway Park venues, should be a primary consideration when weighing cuts.
- 2. Restoring service under the proposed plan is unlikely:** The ability to estimate demand for a service that is cut during *Forging Ahead* is not detailed in the plan, and there is no assurance of the return of services once they are discontinued. We believe that eliminating the #55 bus, even as a temporary measure, will guarantee its permanent demise.
- 3. Independent analysis finds no budgetary justification for the plan:** The MBTA's Advisory Board submitted its report with a statement that significant differences in projected deficits negate the need to slash transit service. Importantly, reduction of services at a time when COVID-19 vaccines are likely to result in increased ridership will pose hardship to citizens returning to workplaces and other activities.
- 4. Current Fenway development anticipates #55 services:** In the Fenway's recent planning, close to 1,820,000 square foot of development has been approved in the West Fenway alone, ***all of which anticipate #55 bus service as part of transportation plan filings:*** Fenway Center Phase 1 and 2, 60 Kilmarnock Street, 201 Brookline Avenue, Fenway Theatre, 1252-1270 Boylston Street, and 1241 Boylston.* Two other large scale developments will advance in the near future. This list excludes ongoing institutional development planning by local universities and the Longwood Medical Area. The work of the city's Transportation Department, Mass DOT, and regional planners have permitted projects based on trip generation and ridership figures which rely on the #55 bus. Removing this line poses an extreme challenge not only to future project planning, but to the successful traffic management of permitted development. This lends the additional point that such service elimination will be performed at a time when demand will undeniably increase as these projects are completed.

Our board understands the hard decisions facing the T. Notwithstanding, we ask that the MBTA retain the #55 bus, even with a reduced schedule, so that it can continue to serve our seniors and meet the demand of a growing community, with the hope that we can continue conversations with you, our representatives, and the community about how to best serve our transportation needs in the future.

Thank you for this opportunity to comment.

For the FCA board,

Timothy Horn, President, Fenway Civic Association
Matthew Brooks, Vice President, Fenway Civic Association

*Project summaries available at www.bostonplans.org

CC:

Chairman Joseph Aiello, FMCB
Secretary Stephanie Pollack, DOT
Councilor Kenzie Bok
Shanice Pimentel, Mayor's Office of Neighborhood Services
Representative Jay Livingstone
Representative Jon Santiago
Representative Chynah Tyler
Senator William Brownsberger

From: [john bookston](#)
To: [Flaherty, Erin \(EEA\)](#)
Subject: #55 bus
Date: Saturday, February 27, 2021 9:25:41 PM

CAUTION: This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Board members,

Please retain some #55 bus service for the elderly and infirm in West Fenway for whom the D subway line is not an option. Doctor and lawyer appointments, library access, testifying at the statehouse or visiting with long-time friends are important for everyone. Doing so would prevent the horrors of isolation for those elderly and frail.

Please save #55 service leaving inbound at least from 9:30 to 3:30 and service leaving outbound from 10:30 to 4:30 on weekdays.

Keeping some service would also allow basing service return on the use during this interim period.

Sincerely,

John Bookston
185 Mass. Ave. apt. 901
Boston. 02115

john.bookston@gmail.com

(A Fenway Cares volunteer, providing food to those in need during these trying times.)

From: rrbel@verizon.net
To: [Flaherty, Erin \(EEA\)](#); [MEPA \(EEA\)](#)
Subject: Fwd: EEA Project # 16324.....# 55 Queensberry Bus AKA Lifeline for workers & Fenway seniors
Date: Monday, March 1, 2021 5:51:07 PM
Attachments: [Screenshot_20201005-205433.png](#)

CAUTION: This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

To: Erin Flaherty

I join my neighbors in protesting the suspension of the 55 Queensberry Bus.

Keep the 55 bus.

Eliminate your committee.

Brenda Lew

Queensberry Street resident

-----Original Message-----

From: Conrad Ciszek <cpciszek@yahoo.com>

To: Helen Cox <coxhelen@aol.com>; Erin.flaherty@mass.gov <Erin.flaherty@mass.gov>;
MEPA@mass.gov <MEPA@mass.gov>; horn@aol.com <horn@aol.com>

Cc: william.brownsberger@masenate.gov <william.brownsberger@masenate.gov>;
jon.santiago@mahouse.gov <jon.santiago@mahouse.gov>; chynah.tyler@mahouse.gov
<chynah.tyler@mahouse.gov>; jay.livingstone@mahouse.gov <jay.livingstone@mahouse.gov>;
kenzie.bok@boston.gov <kenzie.bok@boston.gov>; kim.janey@boston.gov <kim.janey@boston.gov>;
michael.f.flaherty@boston.gov <michael.f.flaherty@boston.gov>; michelle.wu@boston.gov
<michelle.wu@boston.gov>; julia.mejia@boston.gov <julia.mejia@boston.gov>; a.e.george@boston.gov
<a.e.george@boston.gov>; richardgiordano@fenwaycdc.org <richardgiordano@fenwaycdc.org>; Jaya
Aiyer <jaiyer@fenwaycdc.org>; Holly Berry <hollygrooves@gmail.com>; Brenda Lew
<rrbel@verizon.net>; brendalew107@msn.com <brendalew107@msn.com>; Kathy Greenough
<kgreenough@verizon.net>; Mathew Thall <matthall@rcn.com>; Matt Wu
<wuzhengshu839@hotmail.com>; Azmon, Cory L. (HOU) <cory.azmon@mahouse.gov>; Lloyd Alfonso
<lloydalfonso@gmail.com>; Robert Case <r.case@neu.edu>

Sent: Wed, Feb 24, 2021 3:46 am

Subject: Re: EEA Project # 16324.....# 55 Queensberry Bus AKA Lifeline for workers & Fenway seniors

Dear Ms. Flaherty:

I am writing to you today to concur with the comments made previously forwarded to you by fellow Fenway resident, Ms. Helen Cox. I too would like to request that the MBTA reconsider the elimination of this critical transportation line for the West and East Fenway residents.

The 55 bus represents an important lifeline for many of the elderly, disabled and virtually all residents of the East and West Fenway neighborhoods. The route provides an important linkage between the East and West Fenway along with other neighborhoods of Boston inclusive of Back Bay and the South End with transit connections to many other critical destinations.

Many of the residences of the West Fenway are not within an immediate approximate walking distance of any subway line or other major bus route. As Helen stated, there are numerous senior citizen housing developments that are located in the West Fenway that are not within a walkable proximity to an MBTA subway station or other major bus route. The 55 bus provides a critical linkage to other points within the city of Boston.

Already, the discontinuance of the 55 bus serving downtown Boston during the weekdays and middays effective last fall has also been a tremendous disservice for the seniors and other residents who at one time enjoyed a single door-to-door ride from their home to important retail and medical appointments in the downtown area without the burden of transfer. The discontinuance of service to downtown Boston has not only provided a disservice for these residents, but for many other residents comprising of students and young professionals who commute between and from the East and West Fenway to other neighborhoods for work and study. This is a vital service particularly in winter months when it's cold or joint inclement weather when walking is not a viable option.

The complete elimination of the 55 bus would be a tremendous disservice not just to the seniors and disabled residents, but also to many of the newly arriving residents in the East and west Fenway prompted by the new developments. Retailers comprising of large chains and small business sole proprietorships would also be adversely affected as the 55 bus serves many of these retailers right outside their doors.

In addition, once the pandemic has concluded and baseball fans begin returning to the ballpark, the 55 bus provides a significant alternative and supplement to an already overcrowded and congested green line on game days and during other special events.

As Helen said, you cannot base a major transportation decision on current ridership figures. Please be mindful that this is a pandemic and virtually the entire MBTA system has experienced a significant decline and ridership. I have first-hand seen many Green Line trolley cars, and other major bus routes local and Express buses running empty for the past year. For instance, I see many 39 accordion buses running empty or with one or two passengers numerous times daily. I've also seen many number one buses on Mass Avenue riding empty or having just a few riders. However, there is no mention of eliminating those particular routes or eliminating the green line service. These low ridership figures are not permanent but are only temporary because of the pandemic similarly to what is taking place with the 55 bus. Once the pandemic is over the ridership will once again rebound not just for the 55 but for virtually all routes.

The 55 bus is a miniscule expenditure. The bus does not require a significant amount of funding or resources to operate as it usually comprises of only just one bus, one bus driver and it's short route does not utilize a great deal of fuel. This is far less expensive than the numerous 39 accordion buses and one buses and express buses running on the turnpike that are completely empty or have minimal passenger riders. Thus the elimination of a single bus operation that is critical for a neighborhood and critical for the neighborhoods' resurgence following the pandemic. How can these neighborhoods recover or their businesses recover if public transportation linkages are eliminated and no longer exist?

Thus, please refrain from eliminating the 55 bus. Once the pandemic is over and schools return to in-person learning and tourists and visitors return to the Fenway They will be an increase in ridership Not just for the 55 bus but also for other routes such as the one and the 39 and other bus routes currently experiencing low ridership. Also, many of the residents will avoid a hardship of losing a vital transportation link.

For the record, I have attached a copy of an op-ed that I wrote for the Fenway news last fall expressing this viewpoint. Also, the screenshot comprises of letters from our elected officials also speaking against the elimination or reduction of the 55 bus service. Thank you for your consideration.

Sincerely,

Conrad
Ciszek

East Fenway Resident

TRANSPWOES!

Recent MBTA decisions to cut service on the 55 bus route and move a bus stop on Mass. Ave. both took place without community input. The changes—and lack of public process—have riled many Fenwickians. *The Fenway News* publishes letters and an essay reflecting residents' concerns.

Open Letter: Sited With No Community Input, New Bus Shelter Poses Health Risks

DEAR COUNCILOR BOK,

We write you on behalf of the First Fenway Cooperative, 143-149 Mass. Ave. in the Fenway, a limited-equity housing cooperative with 12 units. Our building has commercial units on the ground floor and residential units above. In 2019, we paid \$122,625.52 in real estate taxes to Boston.

As you are well aware, our neighborhood is undergoing rapid change, with the Samuels project beginning near the site of Hynes Green Line station, proximate to our 1894 Arthur Vinal [designed] building.

This construction will have consequential disruptions regarding noise, pedestrian and vehicular traffic, air quality, commercial curtailment, physical effects on nearby buildings, and infestation.

We are writing because a bus

shelter has been built on the sidewalk just next to our apartments, near the corner of Mass. Ave. and Boylston. We were not provided with any notice about this decision. We believe this location is extremely ill-advised and will result in significant pedestrian congestion [the shelter leaves little sidewalk room at one of the busiest pedestrian spaces in Boston]. The shelter serves bus line #1, one the 15 busiest bus lines operated by the MBTA. It will promote air pollution and noise for our nearby apartments as buses stop, idle while loading [large numbers of people will wait for the bus here after walking over from the Green Line], and then accelerate to depart. Studies confirm an increase in air pollution near bus stops, and exhaust is particularly dangerous to health. The noise of buses braking and accelerating also contributes to ill health. Our building is not a high-rise, and our



The new bus shelter at Mass. Ave. and Boylston Street.

windows are not sealed like those in newer buildings.

We were not contacted about this significant change prior to the bus stop's being used, and we strongly object to this siting.

We suggest that a much more preferable site for this bus stop is on Mass. Ave at Newbury Street. There is less residential impact, less pedestrian congestion, and the walk to and from the Green Line to the bus is shorter.

Finally, individuals who are

homeless, often struggling with problems such as substance use disorder, gather at the bus stop due to the lack of services and support.

We appreciate your assistance in bringing about a reconsideration, and, in the absence of a reversal, a meeting with the appropriate parties to discuss this decision.

[SIGNED] BOB CASE, OSLA DEFIGUEIREDO-CASE, PATRICIA HARRIELL, YVONNE HORNE, JOANNE MCKENNA, JOHN PETER, KARLA RIDEOUT, ROSARIA SALERNO, AND JESSICA SORKIN

Route 55 Represents a Lifeline for Residents, Businesses

BY CONRAD CISZEK

The MBTA 55 bus route is a vital lifeline and link to residents of and visitors to the West Fenway, East Fenway, Back Bay, Bay Village, Beacon Hill, and Downtown Crossing neighborhoods of Boston. Most notably,

GUEST OPINION

the route is a link between the West and East portions of the Fenway. Many West and East Fenway residents utilize this bus route as a shuttle between the corner points of their neighborhood district to patronize businesses, attend medical appointments, and to make transportation connections to other local destination points and beyond.

While the East and West Fenway neigh-

borhoods may be viewed as in close proximity, making them walkable, many elderly and disabled residents may be unable to walk this distance. Moreover, many residents—regardless of age, agility, and health condition—rely on the bus route during inclement weather or to assist in carrying bundles accumulated from shopping in these respective areas. In fact, there are many instances where despite my fortunate health condition and capacity to walk, I have utilized this bus to transport myself and my accumulated packages and during periods of inclement weather.

When my late mother used to visit me, we would always take the 55 bus to patronize the movies, restaurants, and shops in the West Fenway or to go and from points in downtown Boston or Copley Square. Given her age and

health, she was unable to walk to the West Fenway, and the 55 bus served her visits well. Without the 55 bus, neither she nor I would have been able to benefit from the products and services of the small and large businesses in the West Fenway and other neighborhoods and they would have lost valuable business.

I was quite appalled to learn of the abrupt service reductions to the 55 bus, which I read about in a newspaper. There was no notice! There was no consultation of the residents of these neighborhoods, nor was there an invitation for community meetings for input! Why did the MBTA feel that they did not need to consult nor include the community in this decision?

The bizarre reduction of evening and midday service along with services to downtown Boston provide a tremendous disservice to residents and visitors and employees who live, work, and patronize these neighborhoods. Residents in the East and West Fenway utilize the 55 bus to commute to Copley Square or Downtown Crossing as it is an alternative to walking up and down the stairs and the other difficulties they may be subjected to using the Green Line. The 55 bus provides a one-stop ride from the West Fenway connecting it to many vital neighborhoods in the city and to downtown Boston. Many elderly and disabled prefer the 55 bus, as it is a much easier option of transportation.

The abrupt service cut provides not only a disservice to the residents of these neighborhoods, but also to many businesses

small and large and their employees situated in the West and East Fenway and adjacent neighborhoods. All of these stakeholders will be subjected to irreparable harm through the reduction of service, which will result in reduced traffic, patronage, and utilization of the products and services of the retailers in these neighborhoods. Businesses already negatively impacted by the pandemic will only be harmed further by these service cuts.

While the MBTA claims to be suffering hardships due to the economic downturn and the pandemic, it could hardly be stated that the continued operation of the 55 bus for a couple of hours in the evening and on weekdays and extending it to serve downtown represents a significant expenditure. The 55 bus under the previous schedule format comprised of one bus, one driver, and a minimal level of fuel.

I believe wholeheartedly that the MBTA has inflicted significant unnecessary harm on members of these neighborhoods for what are minuscule cost savings. Moreover, I believe that there are many other areas of operations and services that the MBTA could examine in its quest to reduce its costs. The 55 bus is a minuscule expenditure, but it is a vital service that many rely on. Therefore, I encourage fellow residents to contact the MBTA to let them know that you would like to see this service restored! Last, I encourage the MBTA to restore the 55 to its previous service levels and look elsewhere for cost reductions.

Conrad Ciszek lives in the East Fens.



Virtual Public Meeting

Simmons University 2019 IMP Projects

Monday, October 5
6:30 - 8:00 PM

Zoom Link: bit.ly/3kdc9PI
Toll Free: (833) 568 - 8864
Meeting ID: 161 266 4061

Project Proponent:
Simmons University

Project Description:

Virtual meeting of the Longwood Medical Area Forum to discuss the Simmons University IMP Projects, including the mixed-use Living and Learning Center project.

This meeting will be held using Zoom. Members of the public are encouraged to attend.

mail to: Edward Carmody
Boston Planning & Development Agency
One City Hall Square, 9th Floor
Boston, MA 02201
phone: 617.918.4422
email: edward.carmody@boston.gov

Close of Comment
Period:
10.14.2020

BostonPlans.org | @BostonPlans
Teresa Pothemus, Executive Director/Secretary

LETTER TO MBTA GEN. MANAGER STEVE POFTAK

Thank you for all your work in the Commonwealth during these difficult times. Our transportation system is faced with significant challenges in terms of resources, funding, and capacity—all of which have been exacerbated during COVID-19.

We write to you as concerned elected officials who have been made aware of recent cuts to MBTA bus #55 which are likely to have a detrimental effect on some of our most vulnerable communities. The #55 bus is a lifeline to many disabled and elderly folks living in the Fenway. Many utilize the #55 bus's convenient route to do their daily food shopping, get to doctor's appointments, or run other essential errands.

Prior to these cuts, the #55 bus would run all day, providing a safe, convenient, and accessible method of transportation for senior citizens and other residents of the Fenway. Our constituents were able to ride the #55 bus at any time of day, avoiding crowded peak times to protect themselves from potential COVID-19 infection.

These service cuts may lead to overcrowding of the #55 bus during peak hours, creating a heightened risk of infection. This harms our elderly and disabled constituents who are most at risk for contracting the disease.

Unfortunately, alternative forms of transportation are not viable for many folks in this population. For many in the West Fenway, Kenmore Square is too far to get to, preventing access to alternative bus routes or accessing the subway. Additionally, constituents have reported difficult accessing The Ride, citing long wait times, a shortage of drivers, and safety concerns regarding the pandemic.

We respectfully request that you reconsider the #55 bus schedule change and re-institute the previous, full-day schedule.

We are also eager to work with you around how to mitigate the aspects of the changes that are having the hardest impacts. Our public transit network should be prioritizing our elderly and vulnerable riders.

[SIGNED] WILL BROWNSBERGER, STATE SENATOR; JON SANTIAGO, STATE REPRESENTATIVE; KENZIE BOK, BOSTON CITY COUNCILOR



To Our Mission Hill and Fenway Neighbors:

The four Colleges of the Fenway (COF) have been your neighbors for almost 900 years. We have been through thick

[Sent from Yahoo Mail on Android](#)

On Wed, Feb 24, 2021 at 2:35 AM, Helen Cox
<coxhelen@aol.com> wrote:

Dear Erin:

.....I was heartbroken when I first heard that the MBTA was thinking of cutting out or cutting back services for the #55 Queensberry bus which travels from the West Fens to Park Street Station except on weekends when it just goes to Copley Square. I recall back in the '70's, '80's & '90's when I took the bus twice a day, 7 days a week to my job downtown.....generally the bus was packed from 7 to 10 & from 12 to 2pm & packed again from 3:30 to 7pm often with standing room only with people going to work both downtown and to Copley Square & people with medical or medical-related jobs coming from downtown to work at the 5 or 6 hospitals in the Longwood medical area or later in the morning with people going to the 6 or 7 schools & colleges in the West Fens area.....and when there was a ballgame or concert at Fenway Park, the bus was jammed.

.....It wld be unwise for the MBTA to base frequency of travel on the Queensberry bus on the statistics available today during a pandemic when many places of employment, education & culture are closed & not to consider what will begin to happen as soon as businesses, colleges, schools, museums & restaurants begin to open up, not to mention Fenway Park as is expected to happen very soon according to Governor Baker and the Legislature as the pandemic begins to wind down.

Already, according to Governor Baker, we have begun to see the Covid numbers beginning to drop so that in 3 to 4 months, people taking the #55 bus will begin to increase concurrently.....as Covid cases begin to drop as vaccinations increase.

.....We, the members of the Fenway Civic Assoc, the Fenway CDC, the Fenway Community Center, the Petererboro Senior Center, the Fenway Garden Society, the Friends of the Muddy River, and the Friends of Ramler Park, do not want to have to come to the table together with our State Senator, our 3 State Reps, our 5 Boston City Councilors to renegotiate this issue with the MBTA as our businesses, restaurants, schools, colleges, etc begin to open up & riders on the #55 bus begin to increase exponentially

.....In view of this, I urge you to think carefully, before you begin to plan any service cutbacks for the #55 Queensberry bus...thank you.....

Sincerely,
Helen Cox,
11 Park Drive #22
Boston, MA 02215

CC: President Fenway Civic Assoc, Fenway CDC, Fenway Garden Assoc, Fenway Community Center, Friends Ramler Park, Friends of the Muddy River, the Peterborough Senior Center, Senator Wm Brownsberger, State Reps Jon Santiago, Chynah Tyler, Jay Livingstone, Boston City

Councillors Kenzie Bok, Kim Janey, Anissa Essabi-George, Michael Flaherty, Michelle Wu

PS: it shld be noted that the West Fens contains 4 subsidized complexes representing at least 3 to 400 seniors & disabled individuals, most, if not all, are low income and many not readily ambulatory. Walking to the subway or walking to the postoffice in the East Fens wld be out of the question. Thus, the 55 Queensberry bus for them, is truly a lifeline.



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March 2, 2021

Ms. Erin Flaherty
Massachusetts Environmental Policy Act Office (MEPA)
100 Cambridge St., Suite 900
Boston, MA 02114

Re: EEA Project #16324

Dear Ms. Flaherty,

We appreciate the opportunity to provide comments on the above-referenced Massachusetts Bay Transportation Authority (MBTA) Environmental Notification Form (ENF) and supplementary information for the Forging Ahead Program. We respectfully request, for the reasons outlined in this letter and attachments, that in the event that the MBTA decides to proceed with the planned Forging Ahead service cuts, MEPA direct the MBTA to go beyond an ENF and require a more comprehensive environmental impact review (EIR) analysis.

Almost one year ago, Governor Baker declared a state of emergency in response to the emerging COVID-19 pandemic. As the Governor's orders affected both the region's economy and movement in and out of Boston, ridership on the MBTA went from crush capacity in February 2020 to 5%-20% of baseline ridership by May 2020. Plummeting fare revenue loss and sustained low ridership paired with mounting COVID-19 mitigation costs put significant strain on the MBTA's budget.

In April 2020, the federal government provided some \$800 million in financial relief to the MBTA. This was welcomed support. With great uncertainty over the duration of the pandemic, the future of additional federal aid, and the presidential election, the Baker Administration launched the Forging Ahead program in September 2020. The initiative's main objective was to identify cost savings, including from service level planning, that would help to offset revenue losses and allow the MBTA to save money for post-pandemic service.

At the time, this was a prudent exercise to undertake. However, in December 2020, when the MBTA's Fiscal and Management Control Board (FMCB) voted on the proposed service reductions and cuts, there was more



clarity about the future. Congress was passing additional transit relief, which would result in a second infusion of funds to the MBTA, the COVID-19 vaccine was available, and internal T financial projections showed that cuts would not be necessary to achieve a balanced budget in FY22. Still, the MBTA and FMCB declared that under all circumstances, including the receipt of any future federal assistance, that it would move forward with substantial service cuts across all modes.

While the MBTA did revise down their initial set of service cut proposals to respond to public concern and feedback, the first set of service cuts have resulted in commuting challenges for essential workers—the very group they intended to safeguard. The upcoming spring changes are set to take effect in March and April just before the workforce is likely to return to the office in some form. If adequate service is unavailable to meet incremental increases in demand safely this summer, i.e. with enough service to allow for physical distancing, it could put the future of the region’s public transit system and economic recovery at risk. More information on system capacity as it relates to thresholds and service cuts would be helpful to better understand the real implications going forward.

As our comments will detail, the ENF and supporting documents are flawed in the following ways:

- 1) There is no evidence that the service cuts will result in significant cost savings
- 2) The analysis looks at cuts at the aggregate level when their impact is at the route level
- 3) The analysis does not reflect any long-term impact on greenhouse gas emissions that could result from permanent mode shift arising from the cuts
- 4) The analysis uses ridership data that does not reflect current characteristics, which could throw off the actual impact on low-income and minority riders.

In light of these factors, we respectfully request that MEPA direct the MBTA to go beyond an ENF and require more comprehensive environmental impact review (EIR) analysis if the MBTA decides to continue with the proposed Forging Ahead service level planning under consideration.

Yours sincerely,

A handwritten signature in black ink that reads 'Richard Dimino'.

Richard A. Dimino
President & CEO
A Better City



A Better City respectfully submits the following detailed review of the Forging Ahead Environmental Notification Form (ENF) and supplementary documents, which concludes the following:

- 1. There is no evidence to support that the service cuts will generate significant cost savings*
- 2. The analysis looks at cuts at the aggregate level when in many cases their impact is at the route level*
- 3. The analysis does not reflect any long-term impact on greenhouse gas emissions that could result from permanent mode shift arising from the cuts*
- 4. The analysis uses ridership data that does not reflect current characteristics, which could throw off the actual impact on low-income and minority riders*

For these reasons, should the MBTA decide to proceed with the planned Forging Ahead service cuts, we respectfully request that MEPA direct the MBTA to go beyond an ENF and require more comprehensive environmental impact review (EIR) analysis.

A Better City's comments are organized in three sections: Section I provides detailed comments on the MBTA cover letter to the ENF; Section II provides a detailed review of the ENF; and Section III comments on the underlying assumptions for the ENF as provided in the CTPS technical memorandum.

SECTION I: COMMENTS ON MBTA COVER LETTER

The Challenge: Protecting Essential Service for Transit-Critical Customer

- A Better City does not dispute that the onset and long duration of the COVID-19 pandemic have resulted in unprecedented challenges for the MBTA. We recognize the immeasurable value of the MBTA and its role as a vital public good—the T has served as a life line to essential, frontline workers, many of whom are transit dependent—underscoring the critical need public transit fulfills for our communities and its relationship to our economy.
- In May 2020, A Better City published *Going the Distance*, an analysis to support COVID-19 service planning efforts. It provided safe physical distance thresholds (maximum number of riders per vehicle) and schematics for the MBTA's bus and



subway and showed that a significant reduction in rider capacity is compulsory to ensure safety protocols are met. A Better City does not concur that service should match ridership if it puts restoration and/or riders at risk. Therefore, running service at 2019 levels, even with reduced demand, makes sense and is the right approach to service planning. Furthermore, in the absence of operational flexibility across all modes, it is the only sensible and safe approach for the MBTA to take given that at full service, MBTA data shows that some MBTA modes experience crowding today, including bus routes with high rider retention and the Blue line.

- Since March 2020, the MBTA has received over \$1 billion in federal stimulus aid. This funding is meant to support public transit agencies with operating costs to maintain service and implement stringent COVID-19 mitigation protocols. A Better City recognizes that at the time Forging Ahead was launched, the MBTA had not yet received the second round of federal relief. However, the MBTA was clear during throughout the fall: under all circumstances, including the receipt of any future federal assistance, it would identify and move forward with substantial service cuts across all modes. This approach puts into question the MBTA’s objectives for implementing service reductions.
- The initial service reduction plan presented to the Fiscal Management and Control Board (FMCB) in November 2020, proposed significant reductions to all modes, putting the safety of riders at risk, leaving high numbers of riders stranded, and putting the future of the region’s public transit system in question. As outlined in A Better City’s report, *MBTA Transit Service: The Key to Our Economic Recovery*, there was no immediate fiscal need for the MBTA to reduce service where ridership is currently low, in particular service that cannot be immediately restored and/or that comes a high cost to bring back, to protect the provision of essential transportation service for transit-dependent riders. Revenue options were left off the table that could have met the MBTA’s own service level planning cost savings threshold.

Public Engagement Program

- A Better City acknowledges the work and effort by the MBTA staff to conduct the rigorous public engagement program over a short period of time. Regrettably, there was no time allocated for public input to review the updated service cuts plan presented to the FMCB on December 14, 2020. Furthermore, there was no formal measure put in place to allow for modification of the plan—only an informal March “check in” with the caveat that it would be too late to walk back changes—locking the Commonwealth and the region into service level changes through the spring and in some cases summer 2021.



Overview of Revised Service Proposal

- A Better City rejects the premise laid out by the MBTA that it will be able to quickly respond to increases in ridership demand when the economy reopens and people return to the workplace. The revised MBTA service proposal adopted on December 14, 2020, puts in place significant reductions in service frequency across most modes but also eliminates some critical services that come with a lag time for service restoration. During Forging Ahead, the MBTA confirmed that some commuter rail reductions would take up to 2 full years to restore. What is more concerning is some of the service changes may go into effect at the time when riders are starting to return to public transit.
- The MBTA claims that the primary reason for implementing service cuts is budgetary. It states that it wants to hold back service today to pay for service post-COVID-19. However, to-date, the MBTA has not provided details on the cost savings that would be associated with revised service cuts, information on when, how long, and how much it would cost to restore service reductions, or if the cuts would result in layoffs. Furthermore, the cost savings information submitted by the MBTA with this Environmental Notification Form do not reflect the service cuts being implemented but rather provide cost savings for the original set of cuts.
- The notion that public transit service can just be turned back on does not hold true for modes like the Commuter Rail, the Ferry, and in some instances the Subway. Crowding may be induced on certain modes if service cannot be restored outside of regular quarterly and bi-annual service change cycles. Pre-pandemic, most MBTA service was running at crush capacity. Post-pandemic, at least in the short term, this will not be acceptable for safety reasons; therefore, more service, not less, will be needed to accommodate increased demand. If the MBTA is not able to provide full service when they need it, the effects could be detrimental to the future of the MBTA, including its contribution to the Commonwealth's greenhouse gas emissions and the regional.

Air Quality and Environmental Justice

A Better City will provide detailed comments in Section III on the *Forging Ahead: Air Quality and Environmental Justice* document submitted by the Central Transportation Planning Staff as there are number of questions A Better City has related to the methodology and data sets used to calculate results. A Better City's primary concerns relate to reporting on impacts at the aggregate level rather than route level, and ridership characteristics in general, as well as on modes and routes that have or will experience deeper cuts, i.e. the MBTA 2015-2017 system survey does not reflect current ridership trends (i.e. low-income and minority).



Further, A Better City believes there is an overarching issue that was not and should be considered: the long-term potentially negative impacts of the cuts on air quality, environmental justice, and equity issues, which may far outweigh the benefits of service reductions. The emission reductions achieved as a result of the cuts could lead to long-term increases or a return to level greenhouse gas emissions down the line if the MBTA is unable to meet incremental service needs that accommodate the pending gradual return to the workplace and establishment of new work schedule routines. If the MBTA loses ridership on the Commuter Rail, for example, these riders will likely divert to single occupancy vehicles and difficult to bring back to public transit. This could lead to a ripple effect that drastically reduces demand for public transit, increases congestions and greenhouse gas emissions from cars, and puts the region’s major rail transformation projects—key to achieving the Commonwealth’s de-carbonization goals—at risk.

Structure of the ENF

A Better City notes that the supplementary information submitted by the MBTA is dated February 20, 2020, and should read February 20, 2021.

SECTION II: COMMENTS ON ENF

General Project Information

Project Description

“The COVID-19 pandemic has had a significant impact on MBTA ridership. The MBTA has not made any meaningful reduction in service levels to correspond to this drop in ridership. Continuing to provide near pre-COVID-19 service levels is unsustainable. The MBTA needs to adjust its service levels to better address the significant drop in ridership that has occurred and to ensure that resources are held in reserve to ensure that the MBTA is able to continue to provide key service to critical workers who have continued to rely on transit over the course of the pandemic.”

- The MBTA has received over \$1 billion in federal stimulus funds since March 2020. These funds are meant to be spent today—not in the future—to keep public transit service running and to help mitigate costs associated with COVID-19 mitigation, e.g. cleaning and disinfecting protocols, PPE distribution, etc. They should not be set aside to address the MBTA’s structural deficit problems, and further Forging Ahead documents presented on December 7, 2020—a week before the vote on service cuts—showed that changes to service level planning were not need to balance the budget in FY22.



- To date, the MBTA has not provided any detailed information on the cost savings that will result from the service cuts or the cost and timeline to restore service when ridership returns. Therefore, it is not possible to determine if the cost savings outweigh the negative impact on riders today and in the future if service cannot be restored immediately meet growing demand.
- Prior to the pandemic, the MBTA was running at crush capacity. During the pandemic, the MBTA is using redefined crowding thresholds to ensure physical distancing is possible. According to MBTA data, crowding on some bus routes and on the Blue Line persists.

Describe the existing conditions and land use on the project site

“The service reductions described in this ENF are across the entire MBTA service area, which covers 175 cities and towns in Eastern Massachusetts. For the purpose of this ENF, the MBTA has defined the “Project Site” to mean the entire MBTA service area, since the proposed service cuts are system-wide...”

The MBTA service reductions are system-wide but some cuts impact certain service areas more than others. This is an important factor to understanding the overall disruption to service and associated impacts. For example, the Commuter Rail only provides service on the weekends on five lines. All of the lines suspended service low-income communities and riders who may be transit dependent. Table 1 below shows pre-pandemic percentages—today, those percentages are likely higher.

Table 1: Pre-Pandemic Ridership Characteristics

Route	Low-income	Minority
Lowell	7%	15%
Fitchburg	9%	17%
Needham	4%	12%
Franklin	6%	12%
Kingston	6%	5%
Greenbush	3%	5%
Haverhill	7%	12%

Source: 2015-2017 MBTA Systemwide Passenger Survey dataset



Describe the proposed project and its programmatic and physical elements

“Challenged by unprecedented low ridership due to the COVID-19 pandemic, the MBTA is facing a historic moment. Despite this significant drop in ridership, the MBTA has continued to run service at pre-pandemic levels, even though it does not match current demand. In order to protect essential service for those who depend on it, the MBTA needs to reduce service where there are fewer riders. The goal of these changes is to preserve access to these transit-critical customers. The MBTA’s plan to readjust service levels to current COVID-era ridership is an overall program that the MBTA refers to as Forging Ahead.”

The MBTA does not need to readjust service levels to current COVID-era ridership to preserve access to transit-critical customers. The MBTA received two rounds of stimulus funds from the federal government intended to prevent service reductions, there is little to no evidence that the proposed Forging Ahead service cuts will result in substantial savings, and there are reports from current riders—essential workers—that the cuts are negatively impacting their commutes. During the MBTA public meetings on the spring service cuts, there were testimonies from essential workers and other riders about the impact of the cuts on their commute. Two are noted below.

- A healthcare worker reported that if she misses her 5:10pm train, she has to wait three hours for the next one, and on Saturdays—a work day for her—she no longer has Commuter Rail service.
- Another participant said he was considering getting a car because of the cuts, commenting that once he shifts modes that he would be permanently gone from the system.

This is a cause for concern, in particular for cuts that could impede the MBTA’s ability to provide service to pre-COVID riders when they transition back to the workplace. The cuts could permanently affect ridership numbers on modes where mass teleworking has driven commuter numbers down dramatically. The impact of a shift away from public transit could do more damage the MBTA’s ability to preserve service for transit-dependent communities.



Describe the on-site project alternatives (and alternative off-site locations, if applicable), considered by the proponent, including at least one feasible alternative that is allowed under current zoning, and the reason(s) that they were not selected as the preferred alternative.

“No Build Alternative or a decision to maintain the same pre-COVID-19 level of service. While this would not result in any reductions of access for the riders, the MBTA has determined this is unsustainable. While the MBTA has received funding through the CARES ACT and additional funding in the recent Consolidated Appropriations Act, these funds are each a one-time infusion of monies. The MBTA anticipates that these funds will assist the MBTA, but without additional cost controls, the MBTA will need to make additional and potentially more severe cuts in the future. All economic forecasts indicate that a return to pre-pandemic scenarios will not occur for a few more years. As such ridership demand—and corresponding fare revenue—will remain low for three to four years. Were the MBTA to refrain from making reductions in service, the MBTA would be unable to marshal resources for continued operations for the critical services. In addition, the MBTA would continue to operate vehicles carrying very few passengers that would be an inefficient use of financial and labor resources, as well as emit air quality impacts that could otherwise be avoided.”

When the Forging Ahead process was launched in September 2020, there was great uncertainty over the future of federal aid, the presidential election, and the future of the pandemic. In December 2020, there was far more clarity on the future, including the potential of additional federal aid to allow the MBTA to maintain full service. Today, the MBTA is in receipt of over \$1 billion in federal aid, and Congress is on track to deliver another \$450-\$600 million through the Biden Administration’s American Recovery Act that is scheduled to become law in March 2021. Furthermore, there is significant progress as a result of COVID vaccine distribution and there are indications that our region is on the road to recovery.

Based on the current situation, there is no justification to withhold federal funding and continue with service cuts that are having negative impacts on current essential riders and could result in inadequate service to support an incremental return to the workplace and public transit. Short-term greenhouse gas emission reductions at the expense of the region’s public transit system are short-sighted. Any adjustments to service should ensure service is more convenient, affordable, and equitable than before and not shrink the system.



“Generate additional revenue and/or reduce operating costs to replace those lost due to the pandemic. The MBTA has the ability to raise “own-source” revenues via activities selling unused land, increasing advertising revenues and other measures. The MBTA is working to generate additional resources by these means, but there is a limit to how much can be raised, particularly during the economic downturn when demand for land or demand for new advertising is limited. The MBTA’s other main source of revenue is fares paid by the rider. The MBTA has determined that any increases in fares would be an economic hardship to our customers, particularly the most transit dependent riders and/or critical workers. Generating additional revenues to meet the MBTA’s revenue needs is unfeasible.”

Unfortunately, the Forging Ahead process sought to reduce costs by reducing or eliminating service rather than look for innovative ways to improve productivity, provide better service, and reduce operating costs. This approach could have gone a long way toward modernizing the public transit system and advancing transformational goals.

Summarize the mitigation measures proposed to offset the impacts of the preferred alternative

“Based on feedback received during this process, the MBTA proposed an updated plan to the Fiscal and Management Control Board in December 2020. This proposal mitigates many of the impacts of the original proposal, better matches current service demand, and accounts for expected ridership levels in the near future. This proposal also allows the MBTA to be flexible and increase frequency in response to ridership and revenue”

A Better City disagrees with the MBTA’s statement that the updated plan “mitigates many of the impacts of the original proposal, better matches current service demand, and accounts for expected ridership levels in the near future.” As shown in the figure below, “Service Proposal for 12/14,” the modified proposal approved by the FMCB on December 14, 2020, does not represent a significant departure from the original set of service reductions and eliminations proposed. Further, to date, the MBTA has provided no information on the timeframe to restore service; therefore, it is unclear how the MBTA will have more flexibility to increase service frequency in response to ridership and revenue.



Service Proposal for 12/14

Mode	Fall 2020 ridership (vs. pre-COVID)	Projected ridership for July 2021 (vs. pre-COVID)		FY21 Scheduled service hours		FY21 Service Proposal	
		Scenario 3	Scenario 2	Modified Proposal for 12/14	Original proposal (11/9)	Modified proposal for 12/14	What changed vs. 11/9
Bus	41%	51%	55%	85-90% est.	85%	<ul style="list-style-type: none"> No change to hours of operation Suspend 20 routes, consolidate 16, shorten 4 20% frequency reduction system-wide non-essential routes 5% frequency reduction system-wide essential routes 	<ul style="list-style-type: none"> Service after midnight 6 Bus Routes (43, 131, 136, 230, 714, 716) Suburban subsidies to 5 communities
Rapid Transit	24%	28%	46%	75-80% (est.)	70%	<ul style="list-style-type: none"> No changes to hours of operation or footprint 20% frequency reduction to Green, Orange, and Red Line Up to 5% reduction to Blue Line 	<ul style="list-style-type: none"> Service after midnight Continue 95% of Blue Line service E Line to Heath Street
Commuter Rail	13%	16%	29%	70% (est.)	65%	<ul style="list-style-type: none"> Maintain partial weekend service Worcester, Providence, Newburyport/Rockport, Middleboro and Fairmount; suspend on low ridership lines End weekday service at 9 PM Reduce peak and weekday service Close 5 stations 	<ul style="list-style-type: none"> Continue to serve Cedar Park stop Partial weekend service on high ridership and transit critical lines
Ferry	12%	16%	29%	>0%, exact service TBD	0%	<ul style="list-style-type: none"> Suspend Charlestown and Hingham direct service Reduce weekday Hingham/Hull ferry 	<ul style="list-style-type: none"> Maintain partial Hingham/Hull weekday service
The RIDE	38%	40%	46%	No changes	No change	<ul style="list-style-type: none"> Adjust scheduling window from 30 to 40 minutes Adjust ADA to Premium based on fixed route changes Adjust hours of operation of Premium service to match Commuter Rail span 	<ul style="list-style-type: none"> Changes only reflect changes made to other modes

Source: [Forging Ahead: Service Proposal](#)

If the project proposed to be constructed in phase, please describe each phase.

N/A

Areas of Critical Environmental Concern

N/A

Designated Wild and Scenic River

N/A

Attachments

1. A Better City notes that attachments 1, 2, and 5 are all dated February 2020 instead of February 2021. Further, attachment 6, Supplemental Information on Ridership, Services, Plans, and Mode Specific Issues, provides information for the initial service proposal and not the revised service proposal which is under review. This information should correspond to the review at hand and should therefore be requested and provided by the MBTA.



2. While the MBTA service cuts are system wide, they do not impact all communities equally. A detailed map of service cuts should be provided to accurately illustrate the impact on the specific communities affected.
3. N/A
4. N/A
5. N/A
6. No comment
7. No comment

Land Section

N/A

Rare Species Section

N/A

Wetlands, Waterways, and Tidelands Section

N/A

Water Supply Section

N/A

Wastewater Section

N/A

Transportation Section (Traffic Generation)

The MBTA did not complete this section, which may be affected by the service cuts if the T is unable to bring back service to meet the incremental increase in demand. The MBTA at a minimum respond to Section II. Traffic Impacts and Permits.

Energy Section

N/A

Air Quality Section



N/A

Solid and Hazardous Waste Section

N/A

Historical and Archaeological Resources Section

N/A

SECTION III: CTPS FORGING AHEAD: AIR QUALITY AND ENVIRONMENTAL JUSTICE ANALYSIS

Overview

No comments

Summary of Results

This study looks at the impacts on air quality and environmental justice that will result from Forging Ahead service reductions in spring and summer 2021 compared to MBTA service provision in spring 2020. This time period does not capture any impacts that may have resulted from the Forging Ahead reductions and cuts that went into place in January, i.e. weekend Commuter Rail service and Ferry Service. In addition, the results of this study do not reflect the potential longer-term impacts on the environment, environmental justice communities, and questions of equity that may be associated with the service reductions and eliminations caused by mode shift from public transit to single occupancy vehicles. Further, the study considers changes at the aggregate level by mode and not at the route level, and it uses the 2015–2017 MBTA Systemwide Passenger Survey dataset for low-income and minority riders—not the current data on rider characteristics that the T is currently collecting—which does not provide an accurate overview of today’s riders.

Planned Service Level Changes

No comments

2. Air Quality Analysis

2.1 1. Methodology

The sketch-level planning analysis involves two components: (1) transit vehicle number and type that together with lower service levels assume a decrease in transit vehicle emissions;



and (2) auto diversions, i.e. reductions in service levels lead to reduced ridership and diversion to autos, increasing emissions from additional auto passenger vehicle-miles of travel on the roadways. This approach seems sensible if the underlying assumptions are accurate.

2.2 Transit Vehicles

The assumptions for the majority of the categories seem fair with the exception of the Commuter Rail where the analysis assumes the MBTA would remove the older and most polluting locomotives (Tier 0 and Tier 1) when reducing service. This has not been confirmed by the operator.

- Bus
- Rapid Transit
- Commuter Rail
- Ferry Service

2.3 Auto Diversions

It's unclear if the data used was recent or pre-COVID-19 data. Most current users are transit dependent and do not have the option to divert to another mode. The question to ask is how many of the non-transit dependent riders currently on the system will leave the system and how many previous riders will not come back as result of the service cuts.

2.4 Emissions by Vehicle Type

No comment

2.5 Final Air Quality Results

The methodology to determine regional air quality impacts by transit technology type, (e.g. bus, commuter rail, etc.) seems viable; however, it does not provide an accurate representation of the local air quality impacts. For auto diversions, it is unclear how the estimate used for Table 2 relates to the process explained in 2.3 related to Auto Diversions.

3. Equity Analysis

3.1 Evaluation of Adverse Impacts

Many of the service reductions and eliminations occur at the route level. As such, the methodology used by CTPS, which only looks at revenue-vehicle-hours (RVH), may not accurately reflect impacts. A Better City notes that CTPS is currently working to reconcile this and notes that it does not expect that it will create disparate impacts or disproportionate burdens.

3.2 Analysis Framework

Demographic Dataset

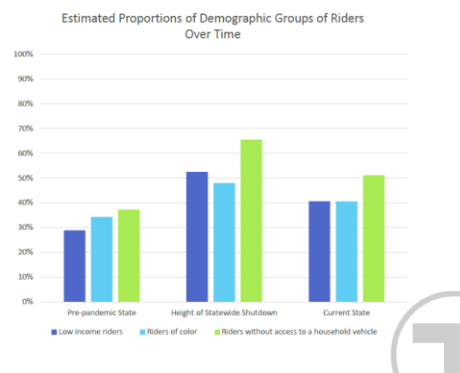
“CTPS in consultation with the MBTA chose to use the 2015-2017 MBTA Systemwide Passenger Survey dataset rather than the United States Census Bureau’s American Community Survey and US census data noting that it was because the majority of the changes being proposed were at the service level rather than the route structure.”

A Better City respectfully disputes this statement. The modes with the most significant changes will experience cuts on specific routes reducing service all together—Commuter Rail, the Ferry, and the 20+ bus routes being suspended, 16 bus routes being consolidated, and 4 routes being shortened.

A Better City also questions the use of the 2015-2017 MBTA Systemwide Passenger Survey dataset rather than the current data on demographics the T is collecting and has on ridership. Pre-COVID-19, 34% of riders were classified as minorities and 29% were classified as low-income.¹ While the analysis uses two methods—proportionate allocation and full allocation—it applies pre-COVID-19 rider characteristics to determine impact. As shown in the figure below, today, these percentages are higher—between 40%-50% or riders are low-income and people of color, and could be higher by mode/route.

Recent Trends: Rider Characteristics

- Differences in usage between demographic groups have affected the composition of ridership over time
 - Before the pandemic, slightly under 30% of riders were low-income
 - This rose to slightly over 50% during the height of the state-wide shutdown in April and May 2020, and is currently around 40%
- The other groups of riders who have been more likely to remain on our system during the pandemic are riders of color (particularly Black riders) and riders who lack access to a household vehicle
- These trends are the strongest with regards to income and vehicle access, which are more directly related to access to alternative modes of transportation



Source: [MBTA Ridership Trends & Projections](https://www.mbtasurvey2018/2015_2017_Passenger_Survey_Final_Report.pdf)

¹ https://www.ctps.org/apps/mbtasurvey2018/2015_2017_Passenger_Survey_Final_Report.pdf



3.3. Change in Weekly Revenue-Vehicle Hours

It is unclear how CTPS estimated the existing RVH by rider classification and change in RVH from the planned spring 2020 schedule to the proposed 2021 schedule. Further, if this calculation were made at the system level, it would not provide an accurate picture of the impact, e.g. some Commuter Rail lines, Ferry routes, and bus routes were completely eliminated.

Weekly Revenue Vehicles Hours: Disparate Impact/Disproportionate Burden Analysis

Same comments apply with respect to rider characteristics and systemwide vs. specific changes.

3.4 Change in Route Length

A formal Title VI service equity analysis will be presented to the MBTA's board in late winter 2021. Tables 7 and 8 (see Figure 1) provide a cursory summary of the demographics of routes that will have their service eliminated outright, which do not seem to reflect the actual percentage of minority riders on the Commuter Rail and possibly the Ferry. For example, Table 8 below allocates 0 minority and low-income route miles. As shown in Table 2, pre-COVID-19 Commuter Rail lines with weekend service eliminated carried low-income and minority riders. Given the low number of non-low income riders currently using the system, this does not seem to capture the real proportional impact on low-income and minority Commuter Rail users as these percentages of these riders are likely larger today.

Table 2: Low-Income and Minority Riders - Pre-COVID-19

Route	Low-income	Minority
Lowell	7%	15%
Fitchburg	9%	17%
Needham	4%	12%
Franklin	6%	12%
Kingston	6%	5%
Greenbush	3%	5%
Haverhill	7%	12%

Source: 2015-2017 MBTA Systemwide Passenger Survey dataset



Figure 1: Table 7 and Table 8 - Forging Ahead: Air Quality and Environmental Justice Analysis

Table 7
Summary of Route Eliminations by Weekly Route-Miles:
Proportionate Allocation

Mode	Minority Route-Miles	Nonminority Route-Miles	Minority Share of Net Change	Low-Income Route-Miles	Non-Low-Income Route-Miles	Low-Income Share of Net Change
Bus	638	1,049	38%	641	1,046	38%
Rapid Transit	N/A	N/A	N/A	N/A	N/A	N/A
Commuter Rail	121	945	11%	69	997	6%
Ferry	4	215	2%	8	211	4%
Total	762	2,209	26%	718	2,254	24%

Note: No route-length changes are planned for the rapid transit system. Weekdays were weighted by "5" and weekend days were each weighted by "1."

N/A = not applicable.

Source: CTPS.

Table 8
Summary of Route Eliminations by Weekly Route-Miles:
Full Allocation

Mode	Minority Route-Miles	Nonminority Route-Miles	Minority Share of Net Change	Low-Income Route-Miles	Non-Low-Income Route-Miles	Low-Income Share of Net Change
Bus	881	806	52%	830	856	49%
Rapid Transit	N/A	N/A	N/A	N/A	N/A	N/A
Commuter Rail	0	1,066	0%	0	1,066	0%
Ferry	0	219	0%	0	219	0%
Total	881	2,091	30%	830	2,141	28%

Note: No route-length changes are planned for the rapid transit system. Weekdays were weighted by "5" and weekend days were each weighted by "1."

N/A = not applicable.

Source: CTPS.

From: [Czepiga, Page \(EEA\)](#) on behalf of [MEPA \(EEA\)](#)
To: [Flaherty, Erin \(EEA\)](#)
Subject: Fw: Town of Abington Comments - MBTA forging ahead service proposal
Date: Tuesday, March 2, 2021 10:22:22 AM
Attachments: [mbta comments 3 2 21.docx](#)

From: Liz Shea <LShea@abingtonma.gov>
Sent: Tuesday, March 2, 2021 9:47 AM
To: MEPA (EEA) <mepa@mass.gov>
Subject: Town of Abington Comments - MBTA forging ahead service proposal

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Good morning,

Attached, please find the Town of Abington Planning Board comments on the MBTA Forging Ahead Service Proposal : ENF

Thank you for your consideration, on behalf of the Board

Liz Shea

Abington Planning Office
500 Gliniewicz Way
Abington, MA 02351
781-982-0069

This E-mail correspondence may be considered public records. Public disclosure of this communication may be required.

- 1) Old Colony Line service is required mitigation for the impacts of the expanded Central Artery project. Cutting service, even on the weekends, will reduce the efficacy of this mitigatory step, resulting in degradation of air quality.
- 2) Traffic continues to grow in Abington and throughout the Route 18 corridor. This will be made worse if more commuters and travelers to Boston are forced to remain in their vehicles to travel to Red Line stations or along Rt-3/I-93.
- 3) In pre-pandemic times, traffic jams were regularly seen throughout the I-93 corridor for multiple hours outside of the traditional "rush hours". Traffic would be snarled even on weekends. Reducing commuter rail service will not help this, resulting in additional vehicle trips on local roadways.
- 4) A universal principle in modern-day urban planning is enhanced public transit. The MBTA should be focused on ways to expand MBTA ridership, not make it tougher for people to use public transportation.

From: dpultinasboston@aol.com
To: [Flaherty, Erin \(EEA\); MEPA \(EEA\); publicengagement@mbta.com](mailto:Flaherty, Erin (EEA); MEPA (EEA); publicengagement@mbta.com)
Cc: william.brownsberger@masenate.gov; jon.santiago@mahouse.gov; chynah.tyler@mahouse.gov; kenzie.bok@boston.gov; kim.janey@boston.gov; michael.f.flaherty@boston.gov; michelle.wu@boston.gov; julia.mejia@boston.gov; a.e.george@boston.gov
Subject: Fwd: EEA #16324 MBTA Service Cuts
Date: Tuesday, March 2, 2021 3:15:08 PM

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Re: EEA # 16324 MBTA Service Cuts

As of March 14, the MBTA planned service cuts eliminate Fenway's 55 bus instead of the community supported alternative to reduce the number of trips. This is an environmental justice crisis . Suspending route 55 service has a disproportionate impact on seniors in low-income households as well as the hundreds of families in income restricted housing on Peterborough in addition to the McKinley Prep students.

As stated in the November Forging Ahead presentation —
Social equity demands that the MBTA focus its available resources on those who depend most on the MBTA.

And their definition-

*We define transit-critical populations as the following, **in no particular order:***

- *Low-income households*
- *Communities of color*
- *The disabled*
- *Households who have few or no cars and no other alternative*
- *Elderly populations*

The 55 route travels on the residential streets in the West Fens, especially important for those older residents who can utilize the stops at Queensberry/Jersey and on Kilmarnock, just blocks from the senior housing developments. The trip from Queensberry to Copley is a short ride on Boylston Street. Important destinations are the Central Library and post offices on Massachusetts Avenue or at the Prudential Mall, public facilities that are missing in the Fenway neighborhood.

The MBTA's suggested alternative - Brookline Avenue bus routes that end at Kenmore Square, requires a transfer to the subway if your destination is Massachusetts Avenue or Copley Square. **The four inbound stops on Brookline Avenue from the Boylston St. intersection to Kenmore Square have no bus shelters, no benches for seniors or shelter from the weather,** not to mention schedule concerns ,minimal weekend service, as well as narrow crowded sidewalks.

Even more concerning, West Fens riders must contend with **service shutdowns on Brookline Avenue from April to October during baseball season- typically shutdowns start 3 hours prior to a game or event, until 1 hour after the game or event concludes. Most games start at 7PM, therefore these detours can start at 4PM.** The detoured buses travel on Beacon Street bypassing Brookline Avenue.

Another factor to consider is pending construction on Kilmarnock, both for the Cabot, Cabot

& Forbes project but also for 201 Brookline Avenue that add difficulties for pedestrians. Sidewalks will be demolished and new roadway construction expected. Walking to Brookline Avenue from Queensberry will be more complicated and the inbound bus stop near Sweetgreen could be impacted. Not to mention the complications for walking through Jersey Street or Lansdowne when they are also closed because of games or events.

Other transit alternatives involve long walks, more than half a mile for the green line from the senior housing on Kilmarnock and on Peterborough. In addition, **there are crossing dangers on roads without traffic signals.** Using the green line on Huntington or the Fenway stop on the D line is more than a half mile walk from 5 Peterborough. Access to the E line means walking across the park then crossing The Fenway at an unsignalized crosswalk. The impacted housing developments in the West Fens; the seniors from the 123 apartments at St Cecilia's House on Kilmarnock, residents from the Robert McBride House on Queensberry, tenants at 5, 78 and 110 Peterborough, the more than 150 seniors who are registered with the Peterborough Senior Center or use the Fenway Community Center on Jersey Street; are all Bostonians who deserve access to the city's resources without having to rely on private automobiles or The Ride.

The 55 is included in the routes categorized in the Forging Ahead documents as “**will take significant amount of time to re add service after reduction**”. And in the February meetings, there was no answer to the question of what metrics will be used to determine when it will resume. The T is suspending the route recklessly without a plan for the future.

This is an urban neighborhood nestled between busy roadways, the Muddy River and the Back Bay Fens. The 55 has been a critical link for seniors to maintain their independence with convenient access to transit. **The rational and just choice is what many have stated in their comments on the T's Forging Ahead plan- if you must make cuts, reduce the frequency but do not eliminate the route-it is a lifeline for many to Copley and downtown.**

Sincerely,

Alison Pultinas

81 Lawn Street Roxbury 02120

Attached are 2 images of the CTPS maps showing quarter mile radius walk zones for two of the closest green line stations, Northeastern on Huntington and Fenway on the D line; the subsidized housing developments on Kilmarnock and Peterborough are outside of both circles. The MFA stop on Huntington also is more than a quarter mile from the West Fens. And the photo with the service advisory warning- no buses on Brookline during ball games.



MBTA BUS

SERVICE ADVISORY

ROUTE DIVERSION



BEFORE OR AFTER BALLGAMES,
DUE TO SEVERE TRAFFIC
CONGESTION, BUSES MAY
BYPASS THE FOLLOWING STOPS:
BROOKLINE AVE AT NEWBURY ST,
YAWKEY WAY, FULLERTON ST,
AND BOYLSTON ST.

THESE NEARBY
STOPS WILL HAVE
SERVICE DURING
ROUTE DIVERSIONS:
BROOKLINE AVE
AT PILGRIM RD OR
KENMORE SQ.



For schedule information:
617-222-3200
617-222-5146 (TTY)
mbta.com



Massachusetts Bay
Transportation Authority

FENWAY STATION NEIGHBORHOOD MAP



- Station entrance/exit
- Commuter rail connection
- Elevator (accessible)
- Bus route
- Bus stop
- CT Bus stop
- Bicycle/Pedestrian path
- Pedestrian path
- Subway track (personal)

YOU ARE HERE

5-10 Minute Walk
 Commuter Rail Platform

5-10 Minute Walk
 Fenway Park

BU CENTRAL

BU EAST

BLANDFORD ST

LANEY

FENWAY

ST. MARYS ST


WOODS



T Station entrance/cit

T Computer rail connection

T Elevator (accessible)



From: [Angela Weiland](mailto:Angela.Weiland)
To: [Flaherty, Erin \(EEA\)](mailto:Flaherty, Erin (EEA))
Cc: mepa@mass.gov
Subject: Fwd: Bus 55
Date: Tuesday, March 2, 2021 2:45:59 PM

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Sent from my iPad

Begin forwarded message:

From: Angela Weiland <angelaweiland@gmail.com>
Date: March 2, 2021 at 1:38:25 PM EST
To: erinflaherty@mass.gov
Cc: MEPA@mass.gov
Subject: Bus 55

As a senior, I recommend you consider allowing Bus 55 to remain to serve a large Community in the Fenway.

Every time, for years, I take the bus people are always waiting for the bus arrival. Also, so many more residents are in the area with more to live here with all the Housing being developed.

Suggestion: to. Cut back a bit have service cut back from 1pm to 3pm in the afternoon.
....and to curtail service at 10pm in the evening from Boylston St. @ the Library.

I and our Fenway Community appreciate a favorable decision for all the issues Discussed.

Thank you.
Sincerely,
Angela Weiland
51 Park Drive
Boston, Ma. 02215
617 267 1299

Sent from my iPad

From: [Czepiga, Page \(EEA\)](#) on behalf of [MEPA \(EEA\)](#)
To: [Flaherty, Erin \(EEA\)](#)
Subject: Fw: Please continue service on the #55 bus
Date: Tuesday, March 2, 2021 4:41:14 PM

From: Anne Louise C Van Nostrand <acv145@comcast.net>
Sent: Tuesday, March 2, 2021 2:41 PM
To: MEPA (EEA) <mepa@mass.gov>
Cc: publicengagement@mbta.com <publicengagement@mbta.com>
Subject: Please continue service on the #55 bus

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Lack of access for any minority groups, and seniors, is not good service for the community.

I am speaking out for the voiceless

Thank you

Anne Van Nostrand, Boston resident for 51 years.



KENZIE BOK
BOSTON CITY COUNCILOR - DISTRICT 8

March 2, 2021

Secretary Kathleen A. Theoharides
c/o Erin Flaherty
Executive Office of Energy and Environmental Affairs
100 Cambridge Street, Suite 900
Boston, MA 02114

Re: EEA Project 16324 (MBTA service changes) & the #55 bus

Dear Secretary Theoharides,

I am writing in strong opposition to the MBTA's announcement that as part of its "Forging Ahead" plan, it will suspend all service for the #55 bus starting on March 14, 2021. This elimination of service poses a health risk to many Fenway residents, especially low-income seniors, along the route who rely on the #55 bus to get to and from everyday services, including the St. Cecilia House, the Peterborough Senior Center, the Copley Branch of the Boston Public Library, community activities in Chinatown, groceries, and healthcare. Cancelling the service is an environmental and economic justice issue for these low-income residents, as more car traffic will crowd the area even as they become unable to easily and affordably pursue their routines without the bus.

The #55 also serves housing for other vulnerable populations without personal vehicles, including the McBride House for people living with HIV/AIDS and Brooke House, an adult residential reentry program run by Community Resources for Justice. The #55 bus is a key outlet for residents seeking to move in and out of the Fenway neighborhood while avoiding the overcrowded Green Line trains during games and events at Fenway Park, which is one of the reasons that the Red Sox joined the neighborhood in advocating against its suspension several months ago. In fact, this aspect of the service will increase in importance given Governor Baker's recently-announced reopening plans regarding large venues such as Fenway Park and increased capacity at restaurants and bars in the Fenway.

Many of the vibrant and active members of our local senior community have physical mobility challenges and rely on the close proximity of the #55 bus stop to their homes, community centers, and everyday services. Given the large and busy roads surrounding the West Fenway neighborhood, without the #55 bus many of these same residents are unable to safely walk or use mobility aids to other MBTA stops such as the Green and Orange Line, and are therefore at increased risk of isolation.

Isolation has severe impacts on seniors' mental and physical health, quality of life, and wellbeing. It is of utmost importance that the Commonwealth of Massachusetts enable our senior residents to age in place with access to the care and communities they've relied on for years.

Many of the senior residents of the 200 affordable units of St. Cecilia House in particular have stayed home over the last year and are primary speakers of Cantonese or Russian, so their access to information about these service cuts and their ability to advocate directly to the MBTA has been extremely limited. Concurrently, many younger residents of the Fenway have moved into newly-created housing with the presumption that they will be able to use the #55 to access jobs at the Prudential and further downtown, and this transit access will be key to the Back Bay economy as commuters begin to return to in-person work.

The "Forging Ahead" plan is a regressive approach to public transportation and considers the narrow economic 'expense' of bus service rather than the expensive and harmful impacts that suspension of service will have on our residents, our neighborhoods, and our planet. The MBTA Advisory Board's December 2020 report advised against the elimination of service and offered a path forward to continue providing this essential public good without major service cuts. Since then, the MBTA has received an immense amount of additional federal funding, making these cuts all the more unnecessary.

I heard from a number of constituents who rely on the 55 bus in Fenway for essential daily services and basic transportation. Here are a few of their stories, which they have authorized me to share with you.

Chris Cullity: I am over 65 years old with bad ankles, knees, and hips and many problems with HIV/AIDS. This bus service cancellation will make me virtually housebound after March 14th when the #55 bus route is cancelled. It will also make all of the senior citizens (who vote) at St Cecilia's House stranded without public transportation, also. Isn't there anybody, a senior citizen's politician/lobbyist who could make the T continue the #55 bus route instead of cancelling it? They say "suspended", I say "Cancelled." The T has been trying to get rid of the #55 bus route for years. Please, think of the hundreds and hundreds of disabled and/or elderly people who depend on bus route #55 to get them to their doctor's appts, the pharmacy, library, and lower cost supermarkets. But until March 14, I will have time to change my pharmacy, change banks, and try to change health care facilities from MGH, where I have been going to

have my HIV treated for almost 20 years, to someplace near here that will take me as a new patient. I loved the care I received at MGH but after March 14th, I will have to find a new health care place that will take me. The one and only reason that I chose to move into my apartment at McBide House in 2012, was because of the #55 bus stop being only 37 paces from my building. Please, help us, we beg you!

Jennifer Gorgone: *As a person with disabilities I depend on the 55 Queensberry bus. I have always considered myself very lucky that the first stop is literally at the corner of my street. As my health issues have increased and abilities decreased, the convenience for getting to healthcare appointments, running necessary errands (grocery store and pharmacy) , and even the occasional treat of walking in the park has been a blessing. In a tough world without COVID, with health issues increasing and now with COVID, this change is making my life even more difficult than it needs to be - I haven't fully processed what this means for me. I do know it will place additional limits on what I am able to do. I was wondering if there has been talk about restoring pick up/drop off times between 10am and 3pm Monday thru Friday on the 55 Queensberry bus as well as service to Park Street. I am unable to go to the bank, the Boston Public Library, healthcare appointments (too many to mention), and would like to be able to go to the Copley Farmers' Market this year as well as sit at the Public Garden and just see people as I am very isolated. Thank you for making Boston accessible to all people.*

Helen Cox: *I was heartbroken when I first heard that the MBTA was thinking of cutting out or cutting back services for the #55 Queensberry bus which travels from the West Fens to Park Street Station except on weekends when it just goes to Copley Square. I recall back in the '70's, '80's & '90's when I took the bus twice a day, 7 days a week to my job downtown.....generally the bus was packed from 7 to 10 & from 12 to 2pm & packed again from 3:30 to 7pm often with standing room only with people going to work both downtown and to Copley Square & people with medical or medical-related jobs coming from downtown to work at the 5 or 6 hospitals in the Longwood medical area or later in the morning with people going to the 6 or 7 schools & colleges in the West Fens area.....and when there was a ballgame or concert at Fenway Park, the bus was jammed.It would be unwise for the MBTA to base frequency of travel on the Queensberry bus on the statistics available today during a pandemic when many places of employment, education & culture are closed & not to consider what will begin to happen as soon as businesses, colleges, schools, museums & restaurants begin to open up, not to mention Fenway Park as is expected to happen very soon according to Governor Baker and the Legislature as the pandemic begins to wind down. Already, according to Governor Baker, we have begun to see the Covid numbers beginning to drop so that in 3 to 4 months, people taking the #55 bus will begin to increase concurrently.....as Covid cases begin to drop as vaccinations increase.....We, the members of the Fenway Civic Assoc, the Fenway CDC, the Fenway Community Center, the Peterboro Senior Center, the Fenway Garden Society,*

the Friends of the Muddy River, and the Friends of Ramler Park, do not want to have to come to the table together with our State Senator, our 3 State Reps, our 5 Boston City Councilors to renegotiate this issue with the MBTA as our businesses, restaurants, schools, colleges, etc begin to open up & riders on the #55 bus begin to increase exponentiallyIn view of this, I urge you to think carefully, before you begin to plan any service cutbacks for the # 55 Queensberry bus...thank you.....

Marie Fukuda: *The #55 bus represents a vital connection for Fenway residents to the city - for a community of over 40,000 residents, the elimination of this service will be detrimental on numerous fronts. The recommendations of the MBTA's advisory board last December stated that there was no budgetary justification for the planned cuts. The cuts of services at a time when COVID-19 vaccines are likely to result in increased ridership will pose hardship for citizens returning to workplaces and other activities. In addition, suspension with no detailed plan to estimate impacts is short sighted and will likely result in permanent injury to communities who rely on these services. The #55 bus provides needed services in the West Fenway for seniors whose housing was developed to make use of this access. For low income residents and seniors living at St. Cecilia's, Robert McBride House, and in subsidized housing along Peterborough Street, the removal of this service represents loss of access and an environmental justice crisis for vulnerable populations. These populations, some who do not speak English, have not been able to attend meetings that require technology and computers - importantly, there is no plan that incorporates their voice in estimating the need for any return to service in the future. The West Fenway is undergoing significant development planning, all of which has assumed #55 service as part of transportation plans. To have removal of services with close to 2 million square feet of development that guarantees increased demand on public transit, at a time when public modes of transit are being increasingly promoted in development, further harms the Fenway community and the city's ability to move towards sustainable transportation for residents and visitors. Please consider these important issues and deny the suspension of the #55 bus line.*

Alison Pultinas: *As you know, the planners' suggested alternative is to use the Brookline Avenue buses headed to Kenmore and then transfer from there to inbound service which is not exactly a solution that works for all the current riders. This is hard for those who live at St Cecilia's or on Peterborough for a number of reasons. I would say most of all is because there's no benches or bus shelters at the inbound stops on Brookline .Walking several blocks to a stop is one thing but having to stand waiting on a narrow sidewalk is not a good situation at all for those with some mobility challenges. The T staff did not answer your question about what metrics they will use to return service, I don't think they have a plan. There are other routes with low ridership, some even pre pandemic. The 55 is such a short trip especially now that it's been cut back to end at Copley. I can't imagine the cost savings will justify cutting this*

service. I hope the required environmental review with MEPA will make a difference. Below, please find 2 images of the CTPS maps showing quarter mile radius walk zones for two of the closest green line stations, Northeastern on Huntington and Fenway on the D line; the subsidized housing developments on Kilmarnock and Peterborough are outside of both circles. And of course Hynes and Symphony are not accessible.





Hundreds of riders dependent on the 55 bus for essential services would be imperiled by its suspension without accessible alternative routes, thereby violating the standard of a “minimum acceptable service level” standard set by the MBTA’s Fiscal Management and Control Board (FMCB). I feel that we’ve too often allowed budgetary decisions to exacerbate the inequality in transit access for our vibrant and diverse communities, including the senior community; we must not let this happen again. I vehemently oppose the elimination of service along the #55 bus route by the MBTA and Governor Baker, as well as any elimination of public transportation. I stand to affirm the importance of providing access to efficient, safe, and reliable transportation to all residents, and implore the MBTA to do the same.

Sincerely,

Kenzie Bok
Boston City Councilor, District 8

From: [Brian Langevin](#)
To: [Flaherty, Erin \(EEA\)](#)
Cc: publicengagement@mbta.com
Subject: EEA Project Number (#16324) - MBTA Forging Ahead Comments
Date: Tuesday, March 2, 2021 11:36:57 PM

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Erin,

I recently became aware of a public comment period for an MBTA Environmental submission period that ended today. I wanted to write to provide my comments and hope I have not missed today's deadline.

I wanted to start my comment by indicating that I am an overwhelming proponent of expanding transit service in the Boston Metro region. I am currently serving as a public member on the MBTA Rider Oversight Committee, but would add this communication represents my personal view rather than the ROC.

I begrudgingly encourage MEPA to accept the MBTA's proposal. My chief complaint is that they did not respond quicker with an action plan. They have waited until we are now on the up-swing. The infusion of federal cash will simply go farther and serve more riders in the future rather than maintain full service for a fraction of ridership. It should not be spent unwisely simply because it is available. I do have faith that full service levels will be restored.

My interest is in the MBTA being able to provide efficient and effective transit service, both now and in the future. Robust transit service has an outstanding positive impact on environmental considerations. In order to do so, the MBTA should seek to maximize the amount of resources available to them as ridership returns to pre-pandemic levels. In normal times, this should mean regular actions to permanently reduce service provided on underutilized transit lines in order to shift resources to over-crowded routes. Travel patterns change and the MBTA needs latitude to adapt. It is important that such changes are level, objective and based upon reasonable criteria.

In normal times, this may mean removal of service that does not meet ridership thresholds in order to provide additional buses on routes that do. Such actions would then be more of a rebalancing across the system rather than a cost-savings measure. In a pandemic, the necessary actions have changed and the temporary suspension of certain routes is a more than reasonable action. While such actions should not be taken lightly, they must be rooted in objective criteria that are fairly and consistently applied across the service area. Such criteria should include considerations for low-income and a transit dependent ridership base. It is simply not prudent to never modify transit service, and the lack of historical modification is why we do not have as robust a network as possible with current resources.

I encourage MEPA to scrutinize the criteria utilized from a process standpoint to determine if it were satisfactory rather than focus on the outcome for individual routes or transit lines. For example, the 55 bus is the subject of local debate to continue serving Boston. From my perspective, this route largely mirrors the existing Green Line outside the Fenway area and has low ridership. It does not provide robust transit service in today's environment with weak

headways and traffic delays. While the MBTA absolutely should look to improving this line (by extending it to South Station/Seaport via an Essex street bus lane instead of the Park Street loop for example on one end and extending it past the Fenway to Longwood on the other) and increasing frequency to something useable and reliable, it is not hard to see why there are routes within the existing network that are more vital during the pandemic. If Boston were concerned about the lack of service from the 55 suspension, they could easily replace it with a free local Fenway circulator route that quickly and frequently connects neighborhood residents to MBTA services or local businesses. It would not be difficult to match existing headways with a few buses. The other thing that Boston could do would be to provide a dedicated bus lane for the route so that it does not experience traffic delays equal to nearly 50% of the route.

Further, MEPA should not lose sight of the positive aspects the MBTA has on reducing vehicle travel. If they did not exist, we could potentially have an additional 500,000 vehicles on the road. Their job is not made easier by MassDOT's removal of HOV lanes and desire to rebuild the Allston throat without a lane reduction. The inability of major cities to deploy bus lanes, transit signal priority, road diets or supplement MBTA service with local/shorter (free) bus routes. The local zoning restrictions by cities and towns in Massachusetts that restrict development around transit locations also hampers ridership growth and parking minimums serve to ensure that vehicle ownership rates will stay higher than they need to be. In summary, the MBTA should not be held to account for the shortcomings of other municipal agencies that perpetuate car dependency.

Regards,

Brian

From: [Czepiga, Page \(EEA\)](#) on behalf of [MEPA \(EEA\)](#)
To: [Flaherty, Erin \(EEA\)](#)
Subject: Fw: EEA Project #16324
Date: Tuesday, March 2, 2021 4:41:33 PM

From: Brittany Baker <brittanyleighbaker@gmail.com>
Sent: Tuesday, March 2, 2021 2:59 PM
To: MEPA (EEA) <mepa@mass.gov>; publicengagement@mbta.com
<publicengagement@mbta.com>
Subject: EEA Project #16324

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To Whom It May Concern:

Please don't cancel the 55 bus. When I lived in Fenway, it was a lifesaver for any errands or appointments I had outside of Fenway and I used it at least once a week. When I moved to Beacon Hill (where I still live), I continued to use it to go back to Fenway for doctor's appointments and other Fenway locations I wanted to continue patronizing. One of the reasons I still live in Boston is because I'm able to live car-free, and losing the 55 bus would be a major blow. It is a critical means of getting in and out of central Fenway, where all trains are at least half a mile's walk. This is especially important in winter with its additional walking hazards.

Sincerely,

Brittany Baker

From: [Cecilia Nardi](#)
To: [MEPA \(EEA\); Flaherty, Erin \(EEA\)](#)
Cc: publicengagement@mbta.com
Subject: EEA project number (#16324) - Please Keep Service on the #55 Bus
Date: Tuesday, March 2, 2021 5:41:08 PM

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Dear Ms. Flaherty,

As a resident of the Fenway at 20 Queensberry Street, who does not own a personal vehicle, the #55 bus has been a critical means of transportation for me. I have used it to commute to work, to do errands, get to entertainment and leisure venues and connect to other means of public transit.

However, I likely have more means to find alternate transit than many of my neighbors. The residents, especially seniors, those with mobility challenges, and those without access to a car, who rely on the #55 bus to get to important resources within and outside of their neighborhood. Many of these folks can't get safely to more distant T stops, especially due to the major roads that ring the West Fenway.

The use of the #55 bus by the neighborhood when the Green Line train is overcrowded during games and events at Fenway Park, and during rush hour. It's vital for our shared public health that residents can safely use public transit as events begin again and businesses reopen.

Lack of access to the #55 puts many seniors at increased risk of isolation. Massachusetts must provide public goods and services, including public transportation, that allow its seniors to age in place in the communities they know and love.

Many of the residents of the Fenway, including the residents of St. Cecilia House, have stayed home over the last year and are primary speakers of Cantonese or Russian. This means they haven't had a real opportunity to comment on the #55 bus suspension and other MBTA cuts.

Many new residents of the Fenway have moved into the neighborhood for its transit access and are depending on the #55 bus to get them to and from work and services in the Fenway and the Back Bay, especially when in-person work returns to full capacity.

Treating public transit as a business, rather than a public good, is short-sighted and will have harmful implications on our neighbors, our City, and our planet.

The MBTA Advisory Board's December 2020 report advised against the elimination of service and offered a path forward to continue providing this essential public good without major service cuts. The MBTA should take this approach, especially given the major federal funding it received after deciding on the cuts.

Too many times we've allowed the Governor and MBTA's budgetary decisions to exacerbate the inequality in transit access for our vibrant and diverse communities, including the senior community, and we must not let this happen again.

Thank you,
Cecilia

--

Cecilia Nardi

nardicecilia@gmail.com

(207) 807-7403

From: [Charles Martel](#)
To: [Flaherty, Erin \(EEA\)](#)
Cc: publicengagment@mbta.com
Subject: EEA Project 16324
Date: Tuesday, March 2, 2021 2:20:55 PM

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Dear Erin and Members of the MBTA Board,

As a resident of the West Fenway since 1983, and a regular user of the #55 bus, am writing with great concern regarding the proposal to eliminate our very important lifeline of public transportation. The consequences of taking away our bus route will impact the neighborhood in all negative ways.

The route has been critical to getting to the #1 bus on Mass Ave., as well as at Copley Square for shopping and getting to work. Many take the bus downtown to Park Street, including then taking the Red Line either to Cambridge or the South Shore.

Young professionals use this route, along with those like myself who are older (66) and still working. I think of the loss this will have on those who are even more senior than I am who take it to the Farmer's Market in Copley Square, as well as getting to necessary medical appointments. And during the winter this is the only safe way to travel, as you can imagine snow and ice making sidewalks impassible and very dangerous.

This bus route also encourages residents not to keep cars, and instead rely on public transportation. While there has been an effort to reduce the congestion caused by car services like Uber/Lyft, this will only *increase* the problems, as well as create great inequality around access to transportation in general.

We know that the pandemic has impacted the City, but we also trust that when the City comes back to life soon we have to be prepared to function once more, and to have this bus route available as it has been for decades.

Please reconsider this proposed decision, and to recognize that this bus

route is a critical lifeline for so many.

Respectfully,

Charles Martel
86 Jersey Street
Boston

From: [Viscount Throckmorton](#)
To: [Flaherty, Erin \(EEA\)](#)
Cc: Kenzie.bok@boston.gov; publicengagement@mbta.com
Subject: EEA project number (#16324)
Date: Tuesday, March 2, 2021 2:05:48 PM

CAUTION: This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

I am a Senior Citizen, over 65, and I live right on the #55 bus route.

If you end the Route #55 bus service, I will become a shut-in because my ankles, knees, and hips can not walk for more than a few minutes at a time.

I have depended on the Bus Route #55 for almost 29 years.

I need to use the bus to see my doctors, go to the post office, bank, pharmacy, library, and more affordable supermarkets.

Over one thousand new units of housing have been built along the #55 Bus Route in the last 5 years.

There are a huge number of Senior Citizen Housing buildings along the #55 Bus Route and also housing for people living with HIV/AIDS.

To take away the only public transport we can afford is cruel, mean-spirited, and short-sighted.

Just take one bus driver off from the over scheduled Bus Route #9 buses (very empty & very frequent) and put that ONE bus driver on the #55 Bus Route.

Please.

Christopher Cullity



City of Cambridge

Executive Department

LOUIS A. DePASQUALE
City Manager

LISA C. PETERSON
Deputy City Manager

Tuesday, March 2, 2021

Kathleen A. Theoharides
Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs
Attn: MEPA Office, Erin Flaherty
100 Cambridge Street, Ste. 900
Boston, MA 02114

Re: EEA Project #16324 – MBTA Forging Ahead Program environmental review

Dear Secretary Theoharides:

The City of Cambridge submits the following comments on the MBTA's environmental review of the Forging Ahead program, comprised of the Environmental Notification Form and supporting materials. In Cambridge, the proposed service cuts suspend indefinitely several bus routes, reduce frequencies on all other bus and Rapid Transit routes, and reduce the number of roundtrips provided and days of service on Commuter Rail. The City's primary area of concern is the lack of a longer-term air quality analysis, for the following reasons:

- MBTA's air quality analysis is limited to a time horizon of summer 2021, only 6 months after of the MBTA's FMCB decision on the service reductions and only several months from today.
- MBTA has presented to their Fiscal Management and Control Board revenue and ridership scenarios through 2023 and therefore has a sense of how many pre-COVID riders would be impacted by the various changes proposed.
- It would appear to be possible to conduct an analysis which incorporates these revenue and ridership forecast scenarios to give a sense of the longer-term environmental impacts.
- The analysis should differentiate the impacts between routes that are suspended indefinitely and routes that have reductions in frequency as these will impact transportation and access in the region very differently.

Given these issues, the City believes that further study is necessary to fully assess the environmental impact of the MBTA's service reductions.

Sincerely,

Louis A. DePasquale
City Manager





CITY OF SOMERVILLE, MASSACHUSETTS
MAYOR'S OFFICE OF STRATEGIC PLANNING & COMMUNITY DEVELOPMENT
JOSEPH A. CURTATONE
MAYOR

GEORGE PROAKIS
EXECUTIVE DIRECTOR

March 2, 2021

Secretary Kathleen Theoharides
Executive Office of Energy and Environmental Affairs
Attn: Erin Flaherty
100 Cambridge Street, Suite 900
Boston, MA 02114

Dear Ms. Flaherty,

Thank you for the opportunity to comment on the submitted Environmental Notification Form (ENF) for the proposed MBTA “Forging Ahead” Service Level Reduction (EEA#16324), dated February 1, 2021 and published in the MEPA Environmental Monitor on February 10, 2021.

The City of Somerville’s advocacy around the “Forging Ahead” service level reductions is well-documented in our public comments during the fall 2020 public comment period. Our community has committed to eliminating carbon emissions from transportation sources. Somerville has simultaneously committed to delivering 6,000 new housing units (of which 1,200 must be permanently affordable housing) by 2030 to help mitigate the regional housing crisis. These ambitious commitments will benefit our community as well as the entire region. They are not feasible with mass transit on the sidelines.

The City serves as a member of the MBTA Advisory Board, an independent body organized under Massachusetts General Law to oversee the finances, operations and activities of the MBTA. The Advisory Board published an independent assessment of the “Forging Ahead” plan in December 2020, finding insufficient justification for the magnitude of service cuts proposed.

The City recognizes the extreme financial pressures facing the Authority. Municipal governments have engaged in similarly painful decision-making on budgetary priorities over the past twelve months. We note that the Authority’s vulnerability to operating revenue gaps is amplified by structural factors including the Commonwealth’s determination to saddle the MBTA with legacy debt service costs associated with the Big Dig highway construction. We call on stakeholders in the MEPA process to continue working to establish predictable and sustainable non-fare revenue sources for mass transit in the Commonwealth.



Specific comments on the ENF are as follows:

Municipal Role in Supporting Mass Transit

The City of Somerville has served as a regional leader in transit-supportive policymaking. In 2014, the City orchestrated a public-private partnership that constructed a new Orange Line subway station in our Assembly Square neighborhood using only private funds and federal funds. In 2015, Somerville helped the Authority secure \$996 million in federal funding to support the Green Line light rail extension, and in 2017 the City helped save the project from cancellation by making an unprecedented \$50 million municipal payment to support the project budget. Between 2017 and 2020, Somerville established five different dedicated bus lane facilities on local streets in order to strengthen MBTA operations and grow ridership, as well as five in-lane bus stops. We recognize that the Authority's success depends on the courage and capacity of its municipal partners to reprioritize street space to advantage bus transit.

Somerville's Broadway (Winter Hill) bus lane project provides an important example of what can be accomplished when the MBTA and a municipality work together. In 2019, the City established a permanent, ½ mile long, bi-directional, 24/7 bus lane in one of our most important Environmental Justice neighborhoods. MBTA Route 89 and Route 101 bus services use the new facility, and benefit from improved reliability and faster travel times. The \$800,000 "quick-build" project was funded in partnership between the City and the Authority (~75% City funding, ~25% MBTA funding). Weekday ridership on Route 89 increased by a stunning 36% following the installation of the bus lanes.

The project was so successfully that in December 2019 the MBTA selected the Broadway corridor as a demonstration project under its Bus Network Redesign Program (BNRP), proposing to add approximately 10 daily trips as well as extra inspection staff positions to actively manage headways as a "High Frequency Corridor". MBTA staff and Board members described the logic of the demonstration project as seeking to inspire municipalities to provide dedicated lanes by reinvesting in the Broadway corridor. This proposal was withdrawn in March 2020 when the scope of the COVID-19 fiscal emergency became clear.

Nevertheless, the City of Somerville recommitted itself to scaling up its on-street bus lane investments as part of its holistic COVID-19 mobility strategy. The City completed three more bus lane projects in 2020, and initiated two more that are scheduled for completion in 2021. By providing dedicated lanes, queue jumps and Transit Signal Priority (TSP) solutions, the City helped our partners at the MBTA to deliver safer and more reliable bus service for essential workers and other customers using the bus during the pandemic.

It is important for stakeholders in the MEPA process to contemplate the opposition that municipalities like Somerville face when restricting curbside parking or eliminating general-purpose travel lanes to advantage bus transit. This opposition is catalyzed by arguments that the MBTA does not provide enough bus service to warrant the share of right-of-way that Somerville's bus lane projects provide. The Forging Ahead service cuts will inevitably reinforce that tension in our community.

Air Quality Analysis

The ENF relies on a sketch-level planning exercise conducted by transportation modelling experts at the Central Transportation Planning Staff (CTPS). The CTPS modelling concludes that projected increases in combustion-generated air pollutants from MBTA customers shifting trips from mass transit to automobile would likely be outweighed by emissions reductions due to running few trips of MBTA vehicles.

The City of Somerville has worked for the past decade with leading air pollution scientists to directly monitor near-highway air pollution in our dense urban neighborhoods. Our work has included pre/post studies at the corridor scale to evaluate effectiveness of new bus lanes in reducing ambient air pollution. New technologies have vastly reduced the costs of direct data collection in the field, and has reduced our reliance on modelling tools such as the CTPS regional travel demand model used in the ENF. We respectfully request that MassDOT and the MBTA be directed to build capacity to collect real air pollution data to better inform regional transportation and land use policymaking.

Service Cut Impacts in Somerville

The “Forging Ahead” service cuts will have a detrimental impact on Somerville residents and workers. Approximately 30% of Somerville residents use mass transit as their primary commute mode. The City acknowledges the profound reduction in MBTA bus and subway ridership in Somerville, but we note that many local bus routes have exhibited durable ridership during the pandemic. Route 95, Route 91 and Route 86 services have continued to serve thousands of MBTA customers in 2020 and 2021. This durable ridership and the essential trip-making our residents and workers depend on has inspired Somerville’s rapid deployment of several new bus lane facilities and Transit Signal Priority (TSP) solutions on local streets.

The ENF acknowledges diversions of transit trips to automobile trips. In dense urban neighborhoods like Somerville’s, each regional cut-through motor vehicle trip using Interstate 93, State Route 38 (Mystic Avenue) and State Route 28 (McGrath Highway) exacerbates historic inequities of air pollution exposure and risk of traffic crashes. The City is closely monitoring daily motor vehicle traffic counts at key locations, and will redouble its efforts to reprioritize road space in service of safe, efficient bus, bike and pedestrian mobility.

The MBTA Green Line Extension to Cambridge, Somerville and Medford is part of the proposed “Forging Ahead” service reduction package. The City notes that the MBTA’s 2015 Full Funding Grant Agreement (FFGA) with the Federal Transit Administration (FTA) obligated the MBTA to operate the GLX at 6-8 minute headways during peak periods. The proposed changes will reduce the hard-won public benefits of the new mass transit service. We request that the MBTA be directed to commit to add back rapid transit and bus transit service in 2021.

Federal Funding

The City of Somerville represents 21 Inner Core cities and towns at the Boston Region Metropolitan Planning Organization (MPO), which is responsible for distributing annual capital funding from the Federal Highway Administration and Federal Transit Administration. In December 2020, the MBTA requested that the Boston Region MPO reprogram approximately \$380 million in capital investment funds between 2021 and 2023 in order to shift resources from capital investments to preventative maintenance activities under its operating budget. Since these federal formula funds were reprogrammed, MassDOT has subsequently received a major package of federal emergency transportation funding. The City recommends that the Commonwealth use this aid to restore MBTA service cuts and restore deferred MBTA capital investments.

Thank you for the opportunity to comment on the “Forging Ahead” Service Level Reduction ENF. The City looks forward to continuing its collaboration with the Authority and with all stakeholders in the MEPA process. Please do not hesitate to contact me with any question or concerns.

Sincerely,

A handwritten signature in blue ink, appearing to read "Brad Rawson", with a long horizontal stroke extending to the right.

Brad Rawson
Director, Mobility Division
Mayor's Office of Strategic Planning & Community Development
City of Somerville, MA

March 2, 2021

Via Electronic Mail and [Online Portal](#)

Secretary Kathleen Theoharides
Massachusetts Executive Office of Energy and Environmental Affairs
Erin Flaherty, Massachusetts Environmental Policy Act Office
100 Cambridge St., Suite 900
Boston, MA 02114

Subject: EEA # 16324: Proposed MBTA Service Reductions

Dear Secretary Theoharides and Erin Flaherty:

Conservation Law Foundation (CLF) submits these comments on the Massachusetts Bay Transportation Authority's (MBTA) Environmental Notification Form (ENF) proposed service reductions under the "[Forging Ahead Program](#)" and requests that you require the MBTA to revise its analysis and halt service reductions until the environmental and equity reviews are complete.¹ CLF works to cut pollution from our cars and trucks, create alternatives to driving, and push for more affordable and equitable public transit options across New England. CLF has a long history of advocating for enhanced public transportation. As such, the proposed service cuts of the "Forging Ahead Program" are of great concern to the organization and its membership.

I. Introduction

In November of 2020, the MBTA released its [Forging Ahead](#) proposal to reduce MBTA service during the COVID-19 pandemic.² After a brief comment period, MBTA amended its original proposal and submitted an updated plan to the Fiscal and Management Control Board (FMCB) on December 14, 2020.³ The updated [Forging Ahead](#) plan, which the Fiscal and Management Control Board approved conditioned on the environmental and equity review process, includes dramatic service cuts that will severely restrict access to transportation and to work for riders, including those in low-income communities, communities of color, and limited

¹ CLF is a nonprofit, member-supported, regional environmental organization working to conserve natural resources, protect public health, and promote thriving communities for all in the New England region. CLF protects New England's environment for the benefit of all people. We use the law, science, and the market to create solutions that preserve our natural resources, build healthy communities, and sustain a vibrant economy.

² *Forging Ahead*, MASS. BAY TRANSP. AUTH., <https://www.mbta.com/forging-ahead> (last visited Feb. 24, 2021).

³ *Id.*

English proficient households. The MBTA proposal rests on the Authority’s [Air Quality and Environmental Justice Analysis](#) (EJ Analysis), which is part of the [ENF](#).⁴ CLF recommends that the Secretary find that the ENF and EJ Analysis require additional actions prior to the MBTA implementing the service reductions. In summary, our comments focus on the following objections to the ENF.

- The law requires the MBTA to complete environmental and equity reviews prior to implementing service changes. Environmental review is ongoing until the Secretary issues a response to the ENF. The equity analyses were prepared in two parts: (1) the EJ Analysis; and (2) the Title VI analysis. Until both equity analyses are complete and the Secretary issues her determination, the MBTA should not implement service reductions and should restore service that has already been suspended.
- The ENF and EJ Analysis are both inaccurate and incomplete. The EJ Analysis greatly underestimates the increase in greenhouse gas (GHG) and other emissions from riders who will switch from public transit to private cars due to reduced transit service. The EJ Analysis also fails to consider shifting population patterns due to the construction of new housing units, as well as the ripple effects of closing certain routes on an interconnected network. According to CLF’s analyses, service reductions result in disparate impacts for communities of color and a disproportionate burden for low-income populations.
- The ENF and EJ Analysis are inconsistent with Environmental Justice Executive Order Number 552 and the Commission on the Future of Transportation Report.
- The mode and route-specific changes are counter to the MBTA’s proposal to focus service to transit critical populations, violate the MBTA service delivery policy, and result in disparate impacts and disproportionate burdens.

II. Legal Requirements for MBTA Service Cuts

Federal and state law impose a number of requirements on the MBTA prior to reducing service. These requirements are in place to protect the environment, public health, and communities at risk, including environmental justice (EJ) populations, people of color, low-income people, and limited English proficient speakers. These requirements are important, and the MBTA should consider them a priority.

M.G.L. c. 161A § 5(d) imposes one such requirement. For any “systemwide decrease in service of 10% or more,” state law requires that no proposal shall be effective until the proposal has been the subject of one or more public hearings, reviewed by the MBTA Advisory Board, and “the decrease shall be the subject of an environmental notification form initiating review

⁴ MASS. BAY TRANSP. AUTH., FORGING AHEAD PROGRAM ENVIRONMENTAL NOTIFICATION FORM (2021).

pursuant to sections 61 and 62H, inclusive, of chapter 30.”⁵ The Massachusetts Environmental Policy Act (MEPA) requires a “determination made by an agency of the commonwealth shall include a finding describing the environmental impact, if any, of the project and a finding that all feasible measures have been taken to avoid or minimize said impact.”⁶ A MEPA determination comes in the form of the Secretary’s Certificate. The ENF should adequately consider the impacts of proposed changes on the environment and on people, with a focus on EJ populations. The MBTA submitted an [ENF](#) on February 1, 2021.⁷ To date, the MBTA has not filed its Title VI analysis.

As a recipient of federal funds, the MBTA is also required to comply with Title VI of the Civil Rights Act of 1964, which prohibits the MBTA from making changes to service that have disparate impacts based on race, color, or national origin, or impose a disproportionate burden on low-income riders.⁸ Likewise, the MBTA must also meet the needs of riders with limited English language proficiency.⁹ As part of the Title VI requirement, the MBTA must conduct an equity analysis prior to implementing any major service change to evaluate whether the planned change would have a disparate impact on people of color or a disproportionate burden on low-income populations.¹⁰ The MBTA has confirmed that it will submit the equity analysis in early March 2021.¹¹

Finally, M.G.L. c. 272 § 98, which applies to all public carriers, provides that “all persons shall have the right to the full and equal accommodations, advantages, facilities and privileges of any place of public accommodation.”¹² Similarly, M.G.L. c. 161A, § 5(a), which governs the MBTA, states:

The authority shall have the duty to develop, finance and operate the mass transportation facilities and equipment in the public interest, consistent with the purposes and provisions of this chapter, to provide a high standard of service to its riders, and to achieve maximum effectiveness in complementing other forms of transportation in order to promote the general economic and social well-being of the area constituting the authority

⁵ MASS. GEN. LAWS c. 161A § 5(d).

⁶ MASS. GEN. LAWS c. 30 § 61.

⁷ MASS. BAY TRANSP. AUTH., FORGING AHEAD PROGRAM ENVIRONMENTAL NOTIFICATION FORM, *supra* note 3.

⁸ 42 U.S.C §§ 2000d; *see also* 49 CFR § 21.5(b) (2); 49 CFR § 21.5(b) (7); 49 C.F.R. Part 21, Appendix C; 34 C.F.R. Part 100.3(b)(2); Exec. Order 552 Mass. Reg. # 1276 (2014).

⁹ Exec. Order 552 Mass. Reg. # 1276 (2014).

¹⁰ 49 C.F.R. Part 21; Federal Transit Administration Circular 4702.1B, TITLE VI REQUIREMENTS AND GUIDELINES FOR FEDERAL TRANSIT ADMINISTRATION RECIPIENTS, (Oct. 1, 2012).

¹¹ MASS. BAY TRANSP. AUTH., FORGING AHEAD PROGRAM ENVIRONMENTAL NOTIFICATION FORM, *supra* note 3, at 5.

¹² MASS. GEN. LAWS c. 272 § 98.

and of the commonwealth. Said duty shall provide that no person shall, on the grounds of age, race, sex, religion, creed, color, sexual orientation, national origin, or handicap, be denied participation in, or the benefits of, or be otherwise subjected to discrimination under any program or activity administered or operated by or for the authority.¹³

The MBTA has not met the legal requirements of Title VI, MEPA, or M.G.L. c. 161A, which are prerequisites to implementing service cuts. The MBTA implemented service cuts for ferry and commuter rail in January 2021, prior to filing the ENF and EJ Analysis. The law requires the MBTA to complete environmental and equity reviews prior to implementing service changes. Environmental review is ongoing until the Secretary issues a response to the ENF. The EJ Analysis is inaccurate as described in Section III. The Title VI analysis is incomplete. Until both equity analyses are complete and the Secretary issues her determination, the MBTA should not implement service reductions. Further, the MBTA’s service cuts are not in the public interest, do not provide a high standard of service to its riders, and fail to achieve maximum effectiveness to promote general economic and social well-being. The Secretary’s Certificate should acknowledge these violations, prohibit further service cuts, and require the MBTA to reinstate the service cuts that have a disparate impact and disproportionate burden.

III. The MBTA’s Analysis of Environmental and Human Impacts from the Proposed Services Cuts is Inaccurate and Invalid.

The MBTA [ENF](#) states that “communities of color, low-income communities, and environmental justice communities do not bear a disparate impact or disproportionate burden” from the proposed changes.¹⁴ The EJ Analysis is wrong in several respects. CLF has collected and studied data showing that service cuts, even if planned around ridership and equity, will affect populations deemed “transit critical” and are, therefore, failing to meet the goals of the Forging Ahead Initiative, creating disproportionate impacts and disproportionate burdens.

The MBTA’s [EJ Analysis](#) is also likely inaccurate in its estimates of greenhouse gas (GHG) and other emissions changes resulting from “Forging Ahead.” The EJ Analysis states that “Forging Ahead” will substantially reduce GHG and other emissions due to the reduced number of transit operations.¹⁵ The EJ Analysis relies upon mode shift factors from the American Public Transportation Administration (APTA) to answer the question: will service reductions result in people choosing to travel by nonmotorized vehicle, motorized vehicle, or

¹³ MASS. GEN. LAWS c. 161A § 5(a)

¹⁴ MASS. BAY TRANSP. AUTH., FORGING AHEAD PROGRAM ENVIRONMENTAL NOTIFICATION FORM, *supra* note 3, at 5.

¹⁵ CENT. TRANSP. PLAN. STAFF, AIR QUALITY AND ENVIRONMENTAL JUSTICE ANALYSIS 7–8 (2021), <https://cdn.mbta.com/sites/default/files/2021-02/4-forging-ahead-ctps-air-quality-and-ej-analysis.pdf> (last visited Mar. 1, 2021).

refrain from making the trip.¹⁶ The EJ Analysis further estimated the number of people who choose to travel by motorized vehicle instead of making a transit trip and assumed they would travel an average of 25 miles per hour.¹⁷ In just one sentence without data or explanation, the EJ Analysis estimates the number of riders who would choose to travel by auto because of the proposed service level changes.¹⁸ The MBTA appears to base its estimates on elasticities derived from past service cuts and fare increases;¹⁹ without more information, it is unclear which prescribed methodology found in the APTA guidance that the MBTA relies on.²⁰ The MBTA should include its assumption about the number of former riders who would choose to travel by car. The MBTA received more than 7,000 comments in one month between November and December from riders stating that reduced service would negatively impact them including many people who would be forced to travel by car instead of transit.

For the EJ Analysis to conclude that emissions will be reduced from Forging Ahead ignores thousands of public comments from actual riders and relies on misguided assumptions. In fact, the EJ Analysis does not adequately consider the amount of mode-shifting that will take place as a result of service cuts. For instance, the report claims that carbon dioxide reductions from service cuts will be almost eleven times more than the increase in carbon dioxide emissions from new cars on the road.²¹ MBTA wrongly assumes that riders will largely remain home instead of driving to work. Yet, many riders will not have the choice to stay home, while others will increasingly decide to drive, as vaccine distribution and businesses re-openings continue to accelerate.

In addition to these errors, the EJ Analysis also fails to adequately consider a number of factors. For instance, the analysis relies heavily on a pre-pandemic baseline of ridership.²² Yet, new housing developments indicate that large ridership changes are about to occur. MassBuilds data shows that nearly 100,000 housing units located within a mile of commuter rail stops have recently been completed, are currently in construction, or are in planning.²³ These long-term investments may be stymied by service cuts that are based on traffic from years past. Many of these new housing projects are Chapter 40B housing developments that include affordable units

¹⁶ *Id.* at 6-7.

¹⁷ *Id.* at 6.

¹⁸ *Id.* at 7.

¹⁹ *Id.* at 5.

²⁰ American Public Transportation Administration (2018). *Quantifying Greenhouse Gas Emissions from Transit*. https://www.apta.com/wp-content/uploads/Standards_Documents/APTA-SUDS-CC-RP-001-09_Rev-1.pdf (last visited Mar. 2, 2021).

²¹ *Id.* at 8.

²² See e.g., *id.* at 3.

²³ MASSBUILDS, <https://www.massbuilds.com/map> (last visited Mar. 1, 2021).

for low-income families.²⁴ These projects are dispersed across 33 municipalities, along 14 commuter rail lines.²⁵ Affordable housing and transportation are key tools to achieve racial justice and combat the long history of segregation in the metropolitan area. Should the “Forging Ahead” service cuts undermine the success of these new housing projects, they would further racial injustice and deepen the metropolitan area’s housing crisis. More details follow in Section IV below.

The EJ Analysis ignores the interconnectedness of the MBTA network. Ensuring continued service on lines that geographically run through EJ communities is fundamental. But implementing service cuts in areas that do not intersect with EJ populations may still result in disparate impacts on people of color and disproportionate burdens on low-income populations. Yet, the EJ Analysis seems to ignore that fact. The EJ Analysis does not provide any information on riders transferring to different lines and routes and fails to describe how Forging Ahead might specifically affect those passengers or propose reasonable alternatives.²⁶

Finally, while the ENF mentions that service reduction will be reviewed as the COVID-19 pandemic evolves, neither the [ENF](#) nor the [EJ Analysis](#) consider how vaccinations are already altering service needs.²⁷ The vaccination rate in the Commonwealth is rapidly approaching 25 doses per 100 people.²⁸ Before implementing any service cuts, the MBTA should explain how it plans to review the rapidly evolving vaccination status and its effects on MBTA ridership. The Commonwealth is currently proceeding with Phase III Step 2 of reopening, with Phase IV Step 1 beginning later in March; it is unclear how the MBTA is evaluating service needs resulting from these policy changes. Additionally, MBTA must analyze how reduced service may affect the speed and efficiency of the vaccine rollout in the Commonwealth. Unfortunately, as noted in public media, vaccination rates have not been uniform across demographic groups.²⁹ It would be disappointing to learn that the MBTA, to justify service cuts, might rely on any reduced people of color ridership that is caused by lower

²⁴ *Chapter 40B Housing Production Plan*, DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT, <https://www.mass.gov/service-details/chapter-40-b-housing-production-plan> (last visited Mar. 1, 2021).

²⁵ *Id.*

²⁶ See CENT. TRANSP. PLAN. STAFF, AIR QUALITY AND ENVIRONMENTAL JUSTICE ANALYSIS, *supra* note 27.

²⁷ See MASS. BAY TRANSP. AUTH., FORGING AHEAD PROGRAM ENVIRONMENTAL NOTIFICATION FORM, *supra* note 3; see also CENT. TRANSP. PLAN. STAFF, AIR QUALITY AND ENVIRONMENTAL JUSTICE ANALYSIS, *supra* note 27.

²⁸ See *How the Vaccine Rollout Is Going in Your State*, NEW YORK TIMES, <https://www.nytimes.com/interactive/2020/us/covid-19-vaccine-doses.html> (last visited Feb. 24, 2021)

²⁹ Abby Goodnough and Jan Hoffman, *The Wealthy Are Getting More Vaccinations, Even in Poorer Neighborhoods*, N.Y. Times, Feb. 2, 2021.

rates of vaccination in communities of color. Conversely, it would be unacceptable for MBTA to ignore the compounding effect that reduced access to transportation will have on other barriers that such populations face to access healthcare in a public health crisis.

IV. The Forging Ahead Cuts Will Result in Disparate Impacts for People of Color and Disproportionate Burdens for Low-Income Populations.

A. Service Reductions on the Subway Will Impact Transit Critical Populations.

The ENF states that there will be a 20 percent frequency reduction to Green, Orange, and Red Lines service, and up to 5 percent frequency reduction to Blue Line service. These reductions will begin March 14, 2021. The MBTA claims to be prioritizing equity in its proposed service cuts – that is, to shift service from whiter, wealthier routes to those that serve transit critical populations. The interconnectedness of the transportation system, the inequities that already exist within it, and recent land use and demographic trends complicate this definition of equity. Our analysis shows how delays undercut baseline service such that service cuts, even if planned around ridership and equity, will affect the transit critical populations the MBTA hopes to continue to serve.

We analyzed transit access and economic opportunity under two scenarios: transit service as scheduled (baseline access) and riders’ reality when service deviates from the planned schedule (reduced access due to transit delays). The baseline access is based on the current MBTA schedule, assuming that everything runs smoothly and there are no unexpected changes. Economic opportunity is defined in the analysis is the total number of jobs (inclusive of all industries) that an individual could hypothetically access within two hours by public transportation including bus and subway. That means that having good public transit access to job centers, where there is a high concentration of jobs in close proximity to each other like Downtown Boston, Longwood, or Kendall Square, equates to greater economic opportunities.

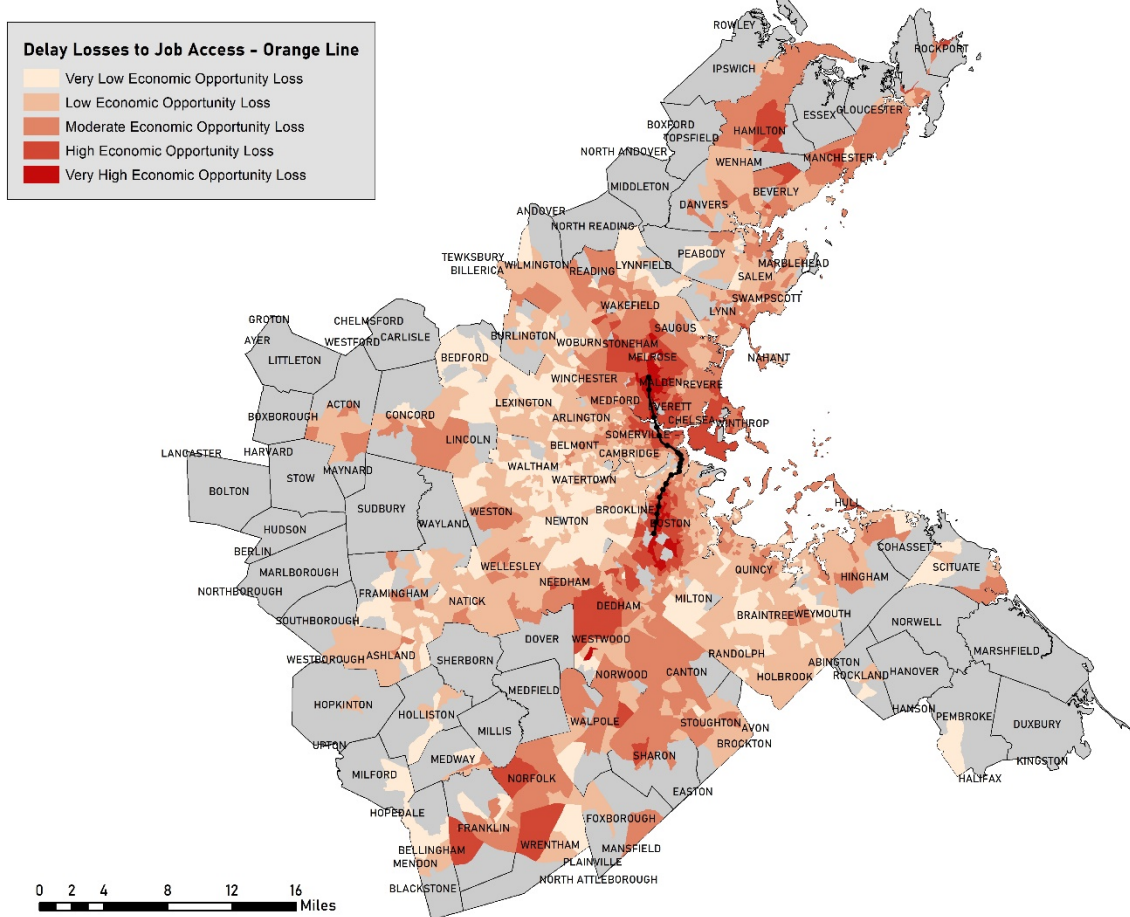
While all jobs were modeled, not all jobs were weighted equally. Our model incorporated a “delay function,” which assigns a weight to a job based on its total travel time, which includes walking to and from transit stations. For instance, 90 percent of commuters travel at least 15 minutes, so a job requiring a 15-minute transit commute is assigned a weight of 0.9. A job 40 minutes away, on the other hand, is valued at 0.6 because 60 percent of commuters travel at least 40 minutes. The final accessibility metric, therefore, is the weighted sum of opportunities. We conducted this analysis for the Red, Orange and Blue Lines, as well as five sample bus routes (Routes 28, 60, 116, 747 and 749). Areas with high economic opportunity loss saw a greater than average loss in baseline access to opportunity as a result of delays. Areas with very high economic opportunity loss saw the greatest loss in baseline access to opportunity as a result of delays.

The findings of this analysis are relevant to MBTA's proposed service cuts in that they demonstrate the following:

- MBTA's system is highly interconnected – in several cases, baseline access to opportunity is undercut in areas far beyond the geographic scope of modeled routes. This suggests that the system is interconnected, and the impacts of delays or service cuts on individual lines have effects beyond the neighborhoods they run through. Therefore, it is not enough to only preserve service on the transit critical routes that MBTA has identified, but to avoid service cuts throughout the whole system.
- For several lines, delays undercut baseline access to economic opportunity more in places where people of color, low income households and limited English speakers live. For the areas immediately surrounding the transportation routes of interest, these populations are disproportionately represented in these areas where baseline access is especially affected by delays, and service cuts will only exacerbate these issues.

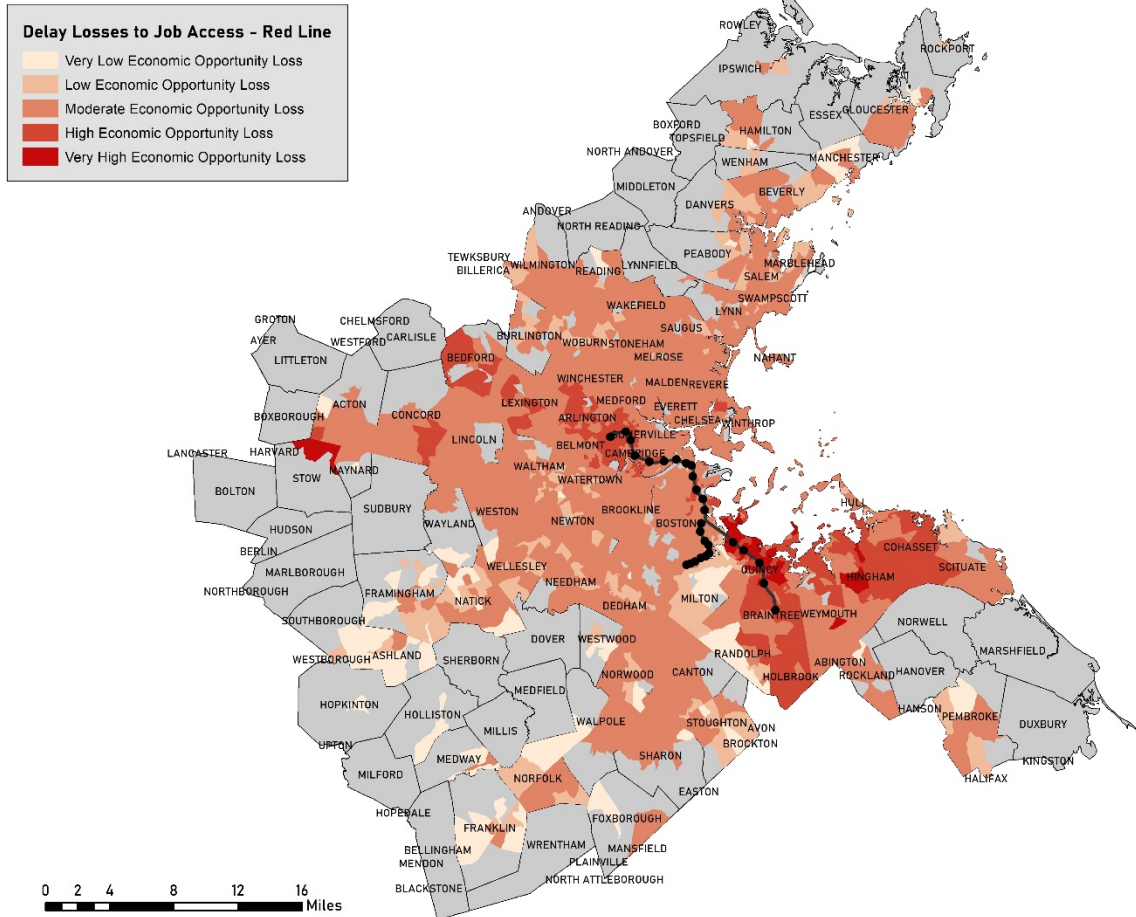
For example, along the Orange Line, which stands to see a 20 percent cut in service beginning March 14, 2021 as part of MBTA's service cuts, communities throughout the entire Metropolitan Planning Organization (MPO) already experience losses in access to economic opportunity, not just communities living alongside the Orange Line.

Figure 1: Areas Affected by Delays on the Orange Line



Furthermore, some of the comparatively highest losses to economic opportunity occur in places that are towards the ends of the subway line, including Oak Grove and Forest Hills and the areas north and south of stops. In both cases, transit riders may be making transfers between bus routes to these subway stops. The same is true of the Red Line running to Braintree.

Figure 2: Areas Affected by Delays on the Red Line to Braintree



Added to these findings is the fact that for nearly all lines modeled, vulnerable populations including people of color, low-income households and limited English proficient households are disproportionately represented in the high and very high economic opportunity loss areas. Meaning, that it is more likely that these critical populations will be represented in areas whose baseline access is most undercut by delays. Rather than working to address these disparities, choosing to cut service exacerbates them, leaving riders waiting for the next bus or train.

For all the routes that we analyzed, these three populations are disproportionately represented. The chart below this disproportionate representation for populations living within a mile of the Red, Blue and Orange Lines and for populations living within a half mile of modeled bus routes – Routes 28, 60, 116, 747 and 749.

Table 1: Presence of People of Color, Low Income Households and Limited English Households for All Modeled Routes

	Total Share - Within Close Proximity	Total Share - Within Close Proximity and High Loss Area	Total Share - Within Close Proximity within Very High Loss Area
People of Color	48%	52%	62%
Low-income Households	37%	40%	44%
Limited English Households	12%	13%	17%

B. Service Reductions on the Buses Will Impact Transit Critical Populations.

The MBTA proposes to suspend 9 bus routes (18, 52, 55, 68, 79, 212, 221, 465, 710), 5 bus routes will be consolidated, and most of the remaining bus routes will experience reduced frequency or itinerary reductions. We summarize the bus service changes below.

- Details from the Spring 2021 Service Changes:
 - Routes suspended (9): 18, 52, 55, 68, 79, 212, 221, 465, 710.
 - Routes consolidated (5): 27 (into 24), 137 (into 136), 214 and 216 into a single line, 217 (itinerary consolidations).
 - Routes with increased frequency: 236.
 - Routes with decreased frequency (22): 10, 11, 21, 29, 31, 39, 47, 61, 71, 73, 77, 89, 93, 96, 101, 112, 134, 220, 222, 225, 501, 504.
 - Routes with some increased frequency and decreased frequency: 1, 16, 32, 57, 70.
 - Routes with changes to hours of service: 67, 85, 131 (fewer hours for all lines).
 - Routes with routing changes: 211, 435 (fewer stops on all lines).
 - Routes with trip changes: 9, 19, 36, 42, 45, 60, 80, 105, 108, 202, 240 (trip reductions or schedule changes).
- The December proposal had 20 line suspensions, numerous consolidations, and 20 percent frequency reduction on system-wide non-essential routes, as well as 5 percent frequency reduction on system-wide essential routes.

Of the bus routes with decreased frequency, many of those routes serve transit critical populations. For example, the MBTA proposes to reduce service on Route 112, which is a route that travels between Chelsea, Everett, and Medford. In fall 2020, the MBTA chose to increase service on the 112 by adding a fourth bus to result in increased weekday service that is

approximately every 30 minutes.³⁰ This increased service on Route 112 is important because the route serves many low-income residents of Chelsea, including multifamily housing for older adults and veterans and connecting those residents to a grocery store and healthcare facilities. The increased service on Route 112 was celebrated by the Chelsea Transportation Task Force, comprised of Chelsea bus riders, Chelsea City Manager, Chelsea City Councilors, GreenRoots staff, MBTA General Manager, MBTA leadership, and CLF. To decrease service on Route 112 later this month will negatively impact transit critical riders and counter the agreement between the Chelsea Transportation Task Force and MBTA regarding increased Route 112 service.

C. Service Reductions on the Commuter Rail Will Impact Transit Critical Populations.

In the December 2020 Forging Ahead plan, MBTA proposed ending service at 9 p.m.; eliminating weekend service on the Greenbush, Kingston/Plymouth, Fitchburg, Franklin, Haverhill, Lowell, Needham lines; and closing 5 stations: Plimptonville, Prides Crossing, Silver Hill, Hastings, Plymouth. The MBTA updated its commuter rail service reductions scheduled to begin April 5, 2021 so that weekday service will be maintained through 11:00 p.m.³¹ Weekend service has already been suspended on the following lines: Greenbush, Kingston/Plymouth, Fitchburg, Franklin, Haverhill, Lowell, Needham.

The ENF and EJ Analysis fail to acknowledge that any reduction of commuter rail service results in a disproportionate impact on Title-VI protected populations. We analyzed data from the American Community Survey (2018, 5-Year Estimates) – Tract-level estimates summed by line. Counts include households and individuals living in tracts that overlap with a mile radius of each commuter rails stop, excluding South Station and North Station. American Community Survey data shows that, in the MBTA service area, 35 percent of the individuals living alongside commuter rail stops are people of color, 34 percent of households along commuter rail lines are low income, and 7 percent of households are of limited English-speaking ability.³² Critically, many workers living in these areas have jobs in sectors, such as construction, service, or maintenance, that are less likely to allow remote work.³³

³⁰ “MBTA Increases Bus Service for Most Chelsea Routes on Aug. 30,” CHELSEA RECORD, AUGUST 20, 2020, <http://chelsearecord.com/2020/08/20/mbta-increases-bus-service-for-most-chelsea-routes-on-aug-30/?fbclid=IwAR24fAkgWYGpG608sQLIZDtjPjj3g5B-8e-VsJPJyZro77KqsoqdIRcFmhA> (last visited Mar. 1, 2021).

³¹ MBTA Service Cuts Spring Proposal, MBTA, <https://www.mbta.com/customer-support/spring-2021-service-changes> (last visited Mar. 1, 2021).

³² *American Community Survey 2018 (5-Year Estimates)*, U.S. CENSUS BUREAU, <https://www.census.gov/programs-surveys/acs/technical-documentation/table-and-geography-changes/2018/5-year.html> (last visited Oct. 24, 2020).

³³ *Id.*

Table 2: Demographics of Commuter Rail Line

Indicates partial weekend service maintained

Line	Total People of Color	Share	Total Limited English Households	Share	Total Low Income Households (<\$50,000/year)	Share	Total Workers Unable to Work from Home	Share
CAPE COD MAIN LINE	9,782	19%	681	3%	9,610	43%	11,780	43%
FAIRMOUNT LINE	165,873	83%	9,161	13%	33,404	49%	37,289	38%
FITCHBURG LINE	102,475	28%	6,034	4%	37,795	27%	42,437	21%
FOXBORO (SPECIAL EVENTS ONLY)	1,499	12%	16	0%	1,136	23%	1,568	23%
FRAMINGHAM/WORCESTER LINE	163,620	35%	16,326	9%	60,756	34%	52,873	22%
FRAINKLIN LINE	26,717	17%	1,004	2%	12,249	22%	18,999	23%
GREENBUSH LINE	10,220	10%	594	1%	11,460	27%	13,615	25%
HAVERTHILL LINE	121,081	35%	11,548	9%	43,609	34%	55,699	31%
KINGSTON/PLYMOUTH LINE	9,831	8%	814	2%	12,787	28%	23,828	35%
LOWELL LINE	70,448	32%	6,152	8%	26,913	33%	35,020	30%
MIDDLEBOROUGH MAIH	35,791	35%	4,257	10%	15,314	35%	14,956	26%
MIDDLEBOROUGH/LAKEVILLE LINE	78,253	46%	4,048	7%	22,699	38%	33,382	38%
NEEDHAM LINE	43,584	31%	3,459	7%	13,325	25%	14,703	20%
NEWBURYPORT LINE	4,516	7%	221	1%	6,542	26%	7,577	23%
NEWBURYPORT/ROCKPORT LINE	138,592	51%	13,659	14%	42,405	43%	63,542	45%
PROVIDENCE/STOUGHTON LINE	97,797	37%	9,027	9%	37,038	37%	34,936	25%
ROCKPORT LINE	3,501	6%	364	2%	8,280	35%	9,235	31%
Grand Total	1,083,580	35%	87,365	7%	395,322	34%	471,439	29%

Further analysis demonstrates that commuter rail cuts will affect nearly 100,000 completed, in-progress, and projected housing units located within a mile of commuter rail stops. The investment and planning to develop such transit-oriented housing that has been ongoing for the past decade may be entirely stymied by these service cuts. The MBTA service cuts will slow our recovery because the MBTA is the only way hundreds of thousands of people in Massachusetts have to get to school and work.

Table 3: Total Completed, In-Construction, Planned, and Projected Housing Units by Commuter Rail Line

Total Housing Units by Line - 2011-November 2020

Line	Completed	In-Construction	Planned	Projected	Total Housing Units
CAPE COD MAIN LINE	0	0	136	0	136
FAIRMOUNT LINE	4,451	1,047	7,157	2,439	15,094
FITCHBURG LINE	2,696	406	595	320	4,017
FOXBORO (SPECIAL EVENTS ONLY)	0	0	300	0	300
FRAMINGHAM/WORCESTER LINE	8,183	2,925	7,573	1,362	20,043
FRANKLIN LINE	985	838	171	0	1,994
GREENBUSH LINE	781	54	274	564	1,673
HAVERHILL LINE	4,356	230	2,609	426	7,621
KINGSTON/PLYMOUTH LINE	1,296	608	1,406	999	4,309
LOWELL LINE	1,620	237	1,056	0	2,913
MIDDLEBOROUGH MAIN	1,941	32	4,177	652	6,802
MIDDLEBOROUGH/LAKEVILLE LINE	286	86	507	0	879
NEEDHAM LINE	1,609	472	1,107	201	3,389
NEWBURYPORT LINE	99	62	274	318	753
NEWBURYPORT/ROCKPORT LINE	2,996	1,651	2,638	4,839	12,124
PROVIDENCE/STOUGHTON LINE	6,266	1,552	4,496	2,095	14,409
ROCKPORT LINE	535	256	105	19	915
Grand Total	38,100	10,456	34,581	14,234	97,371

Data are from MassBuilds, MAPC's database of recent and planned development.

Developments are included in the above count if they are within a mile of a commuter rail stop: <https://www.massbuilds.com/map>

Depriving these regional communities of reliable and consistent transit would result in a disparate impact on Title-VI populations. We further analyzed municipalities located along commuter rail lines that are actively planning for affordable housing and have developed housing production plans under M.G.L. c. 40B. Below is a table with some of the municipalities in the MBTA service area planning for affordable housing. Without reliable commuter rail service, the affordable housing plans may be stymied. In addition, affordable housing is directly related to racial justice - without the production of affordable housing in many of these communities, racial segregation in the metropolitan region will persist while deepening the housing crisis.

Table 4: Municipalities with Housing Production Plans³⁴

Indicates partial weekend service maintained	
Line	Municipalities with 40B Housing Production Plans
CAPE COD MAIN LINE	Barnstable
FITCHBURG LINE	Acton, Belmont, Concord, Weston
FRAMINGHAM/WORCESTER LINE,	Ashland, Grafton, Southborough, Wellesley
FRANKLIN LINE	Norfolk, Walpole, Westwood
GREENBUSH LINE	Cohasset, Weymouth
HAVERTHILL LINE	Andover, Haverhill, Lawrence, Reading
KINGSTON/PLYMOUTH LINE	Hanson, Plymouth, Weymouth
LOWELL LINE	Winchester, Woburn
MIDDLEBOROUGH MAIN	Quincy
MIDDLEBOROUGH/LAKEVILLE LINE	Bridgewater, Lakeville
NEWBURYPORT LINE	Hamilton, Newburyport, Rowley
NEWBURYPORT/ROCKPORT LINE	Swampscott
PROVIDENCE/STOUGHTON LINE	Sharon
ROCKPORT LINE	Gloucester, Manchester

D. Service Reductions on the Ferry and The RIDE Will Impact Transit Critical Populations.

The Direct Charlestown (F4) and Hingham (F1) lines will be suspended and the Hingham/Hull line will have reduced frequency. Some RIDE ADA trips may become premium trips; RIDE trips will be scheduled 40 minutes from request time instead of the current 30 minutes. Premium service hours will be adjusted to complement changes to Commuter Rail hours of operation. Many users of The RIDE have no alternate form of transportation, are low income, and meet the MBTA’s definition of transit critical riders. Increasing the RIDE trip premium for certain trips may be cost prohibitive for many users. Increasing the scheduling time from 30 to 40 minutes adds travel time to RIDE user trips, further burdening such customers.

³⁴ List of 40B Housing Production Plans, <https://www.mass.gov/service-details/chapter-40-b-housing-production-plan> (last visited Oct. 28, 2020).

V. The MBTA's ENF and EJ Analysis Are Contrary to Various Commonwealth Laws and Policies.

The Executive Order on Environmental Justice requires each Secretariat to develop and post online its strategy to promote environmental justice in ways that are tailored to the programs within the Secretariat.³⁵ As part of this strategy, Secretariats, including MassDOT and the MBTA, should have identified economic development opportunities, environmental benefits and other discretionary funding programs that do or should consider the needs of an environmental justice population.³⁶ MassDOT and the MBTA have not developed or posted an environmental justice strategy for the Secretariat. Had they done so, the Forging Ahead cuts could be considered and measured against the strategy.

The Forging Ahead changes are in conflict with the recommendations of the Governor's own [Commission on the Future of Transportation \(Commission\)](#).³⁷ "Investing in and expanding public transit service is critical. Transit is not only the backbone of the Commonwealth's economic center, but also a lifeline for those who depend on it. It is essential that the Commonwealth builds upon what it has in order to develop a transit network that is as robust, reliable, and convenient to remain a viable option and choice for a greater number of people."³⁸ Forging Ahead directly contrasts with Governor Baker's own recommendations just two years ago. The Commission's Report highlighted that people with low incomes, disabilities, limited access to public transit and other transportation options, as well as communities of color are disproportionately affected by pollution, long commute times, unreliable public transportation, rising housing costs, and congestion.³⁹ The Commission noted the need for the MBTA to recognize the impact on low-income communities and communities of color by planning to benefit such populations.⁴⁰

These commuter rail service reductions are inconsistent with the [MBTA Service Delivery Policy](#).⁴¹ The policy committed to the provision of commuter rail service until 10 p.m. on weekdays.⁴² Yet, "[Forging Ahead](#)" cuts service to 9 p.m.⁴³ This reduction, in turn, affects the

³⁵ Exec. Order 552, Section 5, Mass. Reg. # 1276 (2014).

³⁶ *Id.*

³⁷ COMM'N ON THE FUTURE OF TRANSP. IN THE COMMONWEALTH, CHOICES FOR STEWARDSHIP: RECOMMENDATIONS TO MEET THE TRANSPORTATION FUTURE VOLUME I (2018).

³⁸ *Id.* at 35.

³⁹ *Id.* at 33.

⁴⁰ *Id.*

⁴¹ MASS. BAY TRANSP. AUTH., SERVICE DELIVERY POLICY (2017).

⁴² *Id.* at 15.

⁴³ MASS. BAY TRANSP. AUTH., FORGING AHEAD: SERVICE PROPOSAL, 21, <https://cdn.mbta.com/sites/default/files/2020-12/2020-12-14-fmcb-F-forging-ahead-service-proposal.pdf> (Dec. 14, 2020).

ability for those in need of paratransit service to use The RIDE.⁴⁴ Likewise, the Service Delivery Policy committed to bus service frequency on 10-30-60 minute schedules.⁴⁵ While we do not know exactly how MBTA will allocate reductions, the 20 percent and 5 percent system-wide frequency reductions proposed for bus lines will certainly fall short of the policy.⁴⁶ The proposed 20 percent frequency reduction on the Green, Orange, and Red lines will also fall far short of the 10-15 minutes frequency promised in the policy.⁴⁷ Finally, the proposed reductions to the bus network (including the total suspension of 20 routes, consolidation of 16, and the shortening of 4), the wholesale cut of certain commuter rail segments, the closure of rail stations, and the cancellation of ferry lines are all dramatic departures from the [MBTA Service Delivery Policy](#).⁴⁸

While all service cuts will have ripple effects on low-income communities and communities of color, a number of specific service cuts are almost certain to directly and disproportionately affect Title-VI communities. Eliminating late-night commuter rail service and severely reducing late-night bus service will certainly have a disparate impact, as was evident when these services were cancelled in 2015.⁴⁹ Maintaining late-night service is important for the duration of the pandemic to allow essential workers to travel to and from their places of employment. That is especially true in the case of first responders and critical service employees, who are likely to work long hours into the night.

VI. The Secretary’s Certificate Should Prohibit Further Service Cuts and Require the MBTA to Reinstate the Service Cuts That Have Disparate Impacts and Disproportionate Burdens.

In sum, the MBTA has not provided the Massachusetts Executive Office of Energy and Environmental Affairs an adequate picture of the impacts from the proposed service reduction. As such, CLF opposes the “Forging Ahead” program and recommends that the Secretary find that the ENF and EJ Analysis require additional actions prior to the MBTA implementing the service reductions. Should the Secretary issue a certificate, that certificate should prohibit service cuts for any service that results in a disparate impact for environmental justice population and require additional alternatives and mitigation measures, such as expanding the span and

⁴⁴ MASS. BAY TRANSP. AUTH., SERVICE DELIVERY POLICY, *supra* note 18, at 15.

⁴⁵ *Id.*, at 17.

⁴⁶ MASS. BAY TRANSP. AUTH., FORGING AHEAD: SERVICE PROPOSAL, *supra* note 20, at 21; MASS. BAY TRANSP. AUTH., SERVICE DELIVERY POLICY, *supra* note 18, at 17.

⁴⁷ *Id.*

⁴⁸ *Id.*

⁴⁹ Conservation Law Foundation, Alternatives for Community & Environment, and Greater Four Corners Action Coalition Title VI Complaint to the Federal Transit Administration regarding Late-Night Service Cuts (Jul. 26, 2016).



frequency of train and bus service. Transit is essential and additional service must be restored to ensure compliance with federal and state laws and consistency with state policies.

Thank you for the opportunity to provide these comments. You may contact me with questions at SRubin@clf.org and 617-850-1781.

Sincerely,

Staci Rubin
Senior Attorney
Conservation Law Foundation

Copy: Andrew Brennan, MBTA
10 Park Plaza
Boston, Massachusetts 02116
abrennan@mbta.com

From: [Czepiga, Page \(EEA\)](#) on behalf of [MEPA \(EEA\)](#)
To: [Flaherty, Erin \(EEA\)](#)
Subject: Fw: EEA project number #16324
Date: Tuesday, March 2, 2021 1:33:28 PM

From: Daniel <daniel@tentwosevenix.com>
Sent: Tuesday, March 2, 2021 1:02 PM
To: MEPA (EEA) <mepa@mass.gov>
Cc: publicengagement <publicengagement@mbta.com>; Kenzie Bok <mackenzie.bok@gmail.com>
Subject: EEA project number #16324

CAUTION: This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

MBTA!

Please don't discontinue the #55 bus. This bus is a critical route connecting Mission Hill to Downtown/Back Bay. This route is under appreciated and should be expanded not reduced/cut.

Now is not the time to be reducing services. Now is the time to invest in public transportation options to get us all to a greener Boston/MA!

For many in our city, the bus system is the best way to travel based on mobility and safety. My family and I are significant users of the MBTA (subway, commuter rail, bus). These options combined with our ability to make bicycle connections to these modes is the way we live and want to live in the future.

Respectfully Submitted

dnk

Daniel Krulewitch
Boston, MA 02116

From: [Flaherty, Erin \(EEA\)](#) on behalf of [MEPA \(EEA\)](#)
To: [Flaherty, Erin \(EEA\)](#)
Subject: FW: Silver Hill Commuter Rail Stop
Date: Wednesday, March 3, 2021 7:40:32 AM

From: H. David Gold <hdavidgold@yahoo.com>
Sent: Tuesday, March 2, 2021 4:54 PM
To: MEPA (EEA) <mepa@mass.gov>
Subject: Silver Hill Commuter Rail Stop

CAUTION: This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Please ensure that the closure of the Silver Hill stop on the Fitchburg commuter rail line is only temporary.

A large community relies on Silver Hill station to commute to and from work. (Ridership from Silver Hill is much greater than the MBTA's published data would indicate.) In this region, Silver Hill station provides the only practical option for public transit service during commuting hours, due to traffic congestion on Route 117 and parking limitations at other stations like Kendal Green. For many of us, the presence of Silver Hill station, which has provided service since June 17, 1844, was a major factor in deciding to purchase our homes.

Eliminating Silver Hill station would force us into our cars, which would:

- Increase traffic congestion and delays,
- Increase the risk of traffic accidents,
- Increase emissions of carbon monoxide and other pollutants, and
- Violate the MBTA's basic mission of providing reliable public transit service.

Once we are back to pre-COVID-19 conditions, or Phase IV of the Commonwealth's Reopening Plan, there will be no principled basis to eliminate the environmental and rush-hour commuting benefits provided by service at Silver Hill station. Under pre-COVID conditions, 38 inbound and outbound trains passed Silver Hill station on weekdays. But only 5 of those trains (2 inbound and 3 outbound) were scheduled to stop at Silver Hill station. And because Silver Hill is an "F Stop," those 5 trains only stopped during commuting rush-hours to pick up passengers visible on the platform or to discharge passengers on notice to the conductor. None of the 14 inbound and outbound trains stopped at Silver Hill station on weekends. Furthermore, because the commuter rail crosses Merriam Street under a bridge, stopping the train at Silver Hill station does not affect traffic traveling on Merriam Street.

Eliminating Silver Hill station would significantly reduce home values. The presence of a commuter rail stop has been shown to increase surrounding home values by 7-8 percent. For

nearly 1,000 homes in Lincoln, Concord and Weston, Silver Hill station is the closest stop on the commuter rail system.

Finally, the presence of Silver Hill station provided justification for the development of a transit-oriented senior development project in our neighborhood –please see <https://www.enterpriseneews.com/story/weston-town-crier/2020/07/23/development-agreement-approved-for-8-senior-units-in-weston/114624076/> That project should not be left stranded.

This comment reflects the views of a substantial and growing population of passengers that travel to and from Silver Hill station. We understand the rationale for a temporary suspension of service during the COVID-19 pandemic, but we oppose any permanent reduction in commuter rail service at Silver Hill station.

Respectfully submitted,

Dave Gold

From: [Elaine King](#)
To: [MEPA \(EEA\)](#)
Cc: [Flaherty, Erin \(EEA\)](#)
Subject: EEA # 16342
Date: Tuesday, March 2, 2021 4:43:01 PM

CAUTION: This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Hi There,

I'm writing to appeal to you that you support service of the 55 bus in the Fenway neighborhood.

Soon the farmers market will be opening. Many of my neighbors use the bus to attend as I do, but my neighbors don't speak English, so aren't aware or able to voice concern. Most are elderly. I myself rely on the 55 bus due to a disability. Kindly support some level of service with the 55 bus while we are going through these hard times. Thank you!

Regards,

Elaine King

From: [Czepiga, Page \(EEA\)](#) on behalf of [MEPA \(EEA\)](#)
To: [Flaherty, Erin \(EEA\)](#)
Subject: Fw: #55 bus
Date: Tuesday, March 2, 2021 4:36:38 PM

From: Erica <erbernst@gmail.com>
Sent: Tuesday, March 2, 2021 1:31 PM
To: MEPA (EEA) <mepa@mass.gov>
Subject: #55 bus

CAUTION: This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

I am a long time Fenway resident and have used the #55 bus often over the years. It is an important route for moving about our neighborhood and the public library, shopping and parks in Back Bay. Many people in Back Bay and Fenway do not own cars and the #55 is a convenient way to move through the neighborhoods. The T-stops don't adequately serve the local area and the high volume usage of the T during usual Red Sox and concerts makes it difficult to move freely around the neighborhood. Also the T-location in Fenway is not accessible to the neighborhoods for mobility challenged folks. The MBTA Advisory Board's December 2020 report advised against the elimination of service and offered a path forward to continue providing this essential public good without major service cuts. The MBTA should take this approach, especially given the major federal funding it received after deciding on the cuts. Please preserve the #55 bus.

Best, Erica
75 Peterborough St, Boston, MA 02215



March 2, 2021

Secretary Theoharides
Erin Flaherty, Environmental Analyst
Massachusetts Environmental Policy Act Office
Delivered via email: erin.flaherty@mass.gov

Re: Public Comment to the Massachusetts Environmental Policy Act (MEPA)
Office regarding the MBTA's Environmental Notification Form (EEA project
number #16324).

Dear Secretary Theoharides and Erin Flaherty:

On behalf of our members, transit-dependent riders and other stakeholders,
GreenRoots and concerned residents offer the following comments regarding service
cuts to MBTA service, in particular to environmental justice populations.

GreenRoots is a resident-led organization working to achieve environmental justice and
improved public health in Chelsea and East Boston. A core tenet of our work is
transportation justice. The two communities we engage, Chelsea and East Boston, are
some of the most transit-dependent in the state. In fact, Chelsea has three of the
busiest bus lines in the entire MBTA system. One third of East Boston households do
not own a car. In East Boston, 55.4% of East Boston commuters ride the train to and
from work daily, which is higher than 99% of neighborhoods in the US.

Through GreenRoots transit justice work, we collected 465 surveys about public
transportation in Chelsea and East Boston. 58% total respondents were transit-
dependent and 67% said that they depend on public transit to get to and from work.
Almost half of all respondents, 49%, said they do not have access to a car at all. Of the
Spanish-speaking respondents, 81% said that they depend *solely* on public
transportation to get around, 85.9% of Spanish-speaking respondents use public
transportation to get to meetings and appointments, and 74.3% use it to get to work.

GreenRoots • RaicesVerdes
227 Marginal Street, Suite 1, Chelsea, MA 02150
617.466.3076 • www.GreenRootsChelsea.org

Both Chelsea and East Boston are environmental justice communities shouldering a disproportionate share of the region's industrial burdens. As a result, we have some of the highest levels of air pollution and our residents have some of the most compromised public health. Chelsea and East Boston also are two of the communities hardest hit by COVID19 in Massachusetts. Chelsea's per capita infection rates make it one of the most impacted cities in the nation. East Boston is identified as the hardest hit Boston community, with rates equaling or surpassing those in Chelsea. We are just seeing the beginning of the long-term impacts, both health and economic, of COVID-19 in both these communities.

COVID-19 exposed and made clear how these long standing inequities affect the lives of environmental justice communities like Chelsea and East Boston.

Now more than ever, is when the State of Massachusetts must prioritize the health and well-being of those who have literally sacrificed their lives for the greater good of the Commonwealth. Now is the time for **investments** in environmental justice communities, not a continuation of policies and practices that continually **oppress** and **harm** vulnerable communities. The State of Massachusetts has a moral obligation to provide affordable, reliable public transit. Service cuts will further segregate and hold back our communities, remove critical public transit service, and add economic and public health hardships.

In addition to the aforementioned concerns relating to unjust burdens and the need for greater transit justice, GreenRoots and the undersigned residents outline the following significant concerns:

1. The ENF's EJ Analysis is Inaccurate

The Environmental Notification Form (ENF) and the Environmental Justice Impact Analysis that have been submitted for this project, the MBTA Forging Ahead, are inaccurate. The ENF states that low income communities, communities of color, and environmental justice communities will not bear a disparate impact or disproportionate burden from the service cuts. The residents of Chelsea and East Boston will bear a disparate impact and disproportionate burden from any public transit cuts. Our communities rely on public transit for basic everyday necessities such as grocery shopping, medical appointments and daily commuting to work, childcare and more. A critical bus line in Chelsea, #112, is on the list of buses that will see a reduction in

service. This line alone provides necessary service to two otherwise isolated neighborhoods: The Chelsea Soldiers Home and Admirals Hill, both of whom have aging and disabled populations. For both of these neighborhoods, the 112 is a critical lifeline to grocery stores, medical appointments and connections to other service lines. GreenRoots strongly believes our veterans, aging populations and the disabled, should not be the victims of this Administration's disinvestment strategies.

2. Public Transit Reductions will not Result in Emissions Reductions

The MBTA's Air Quality and Environmental Justice Analysis also inaccurately states that there will be air emissions reductions as a result of the proposed service cuts. This is a ludicrous statement, that if true would support a complete elimination of public transportation. This Administration has prided itself on moving individuals out of cars and onto public transportation, yet this statement is offering the exact opposite theory. One need not be an environmental expert to know more reliable public transportation reduces individual vehicle trips and therefore reduces air emissions.

Furthermore, if we learned anything from the pandemic, it is that our essential workers, those who risked their lives for the economy by continuing going into work every single day exposing themselves and their families to COVID19, rely on public transit. A reduction in public transit will not remove the need for Chelsea, East Boston and other essential workers from attending work in person; rather, it will shift the economic burden and force them to pay for rideshares causing greater economic instability while **increasing emissions** from individual cars on the road.

3. Inconsistency with Commission on the Future of Transportation Report and EO 552

The proposed service changes are inconsistent with the Commission on the Future of Transportation's report which states: ***"Investing in and expanding public transit service is critical. Transit is not only the backbone of the Commonwealth's economic center, but also a lifeline for those who depend on it. It is essential that the Commonwealth builds upon what it has in order to develop a transit network that is as robust, reliable, and convenient to remain a viable option and choice for a greater number of people."***

The report went as far as to recognize the disproportionate impact limited access to affordable and reliable public transportation has on low income communities and

communities of color. The service cuts are not only inconsistent, but **contrary** to the need for investment and expansion of public transit, in particular for environmental justice communities.

4. Service Cuts Further Impact EJ Communities

We strongly oppose any service reductions that impact environmental justice communities such as Chelsea and East Boston.

The Chelsea Public Transit Task Force, a committee of GreenRoots, T riders, city officials and the MBTA General Manager and leadership, has been meeting for almost two years to improve the reliability of public transportation. Over the past two years, the 112 bus route has been central to our conversations and the strategic focus of the General Manager. In fact, the Task Force, including the General Manager and his staff, worked to design a pilot program that added a much-needed additional bus to Route 112, reducing headways to 30 minutes between scheduled buses. However, only six months into this pilot, in a decision counter to the community process that led to the pilot, Route 112 is being slated for service cuts through less frequent weekday service.

This decision squanders resources -- the time and energy of the community as well as the MBTA who worked on this for months -- and further bolsters the mistrust the community and the riders have of the MBTA.

No service reductions should go into effect.

In conclusion, we strongly believe the proposed public transit service cuts will be detrimental to our environment and the health of the people of Chelsea, East Boston and other EJ communities. Furthermore, these cuts will exacerbate the climate crisis by increasing air emissions in Massachusetts, reversing our state's "progressive" agenda to be carbon neutral by 2030.

Now more than ever, the Commonwealth needs to show its commitment to protecting low-income communities and communities of color. Public transit is a lifeline for the majority of Chelsea residents. Reducing service to the bus #112 will have significant negative consequences in the lives of the most vulnerable, in particular the senior population in Chelsea. More broadly, any service cut to public transit will have a ripple effect in the wider system and undoubtedly disproportionately impact low-income communities, communities of color and immigrant communities, like Chelsea.

GreenRoots • RaicesVerdes
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Sincerely,

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Judith Garcia, Vice President
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Chelsea City Council, At-Large
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Daily Rider of Bus #112
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Stuart Spina
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Socheath Toda
D'Ambrosio Rd
Lynn, MA

From: [Czepiga, Page \(EEA\)](#) on behalf of [MEPA \(EEA\)](#)
To: [Flaherty, Erin \(EEA\)](#)
Subject: Fw: ENF for MBTA Service reduction
Date: Tuesday, March 2, 2021 1:33:41 PM

From: Sharon McCarthy <sharonharvardboh@gmail.com>
Sent: Tuesday, March 2, 2021 11:02 AM
To: MEPA (EEA) <mepa@mass.gov>
Cc: 'Harvard BOH' <boh@harvard.ma.us>
Subject: ENF for MBTA Service reduction

CAUTION: This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

The Harvard Board of Health is responding to your request for comments on the proposed service reductions the MBTA is considering. The Board of Health is opposed to any reduction of service on the Fitchburg Line. This line is the ONLY form of public transportation in this area of the state.

Decreasing service will have at least two negative impacts:

- Reducing train service will force people into their vehicles, increasing traffic and congestion on the Rt 2 corridor and increasing air pollution.
- This is an environmental justice issue. Reducing train service will adversely effect people who do not have a vehicle and depend on the MBTA for transportation to a job. Those riders are disproportionately people of color.

Thank you for considering these issues when the MBTA proposal is considered.

Regards,
Sharon McCarthy, Chair
Harvard Board of Health



Virus-free. www.avg.com

From: [Helene A. Woodvine](#)
To: [Flaherty, Erin \(EEA\)](#)
Subject: #16324
Date: Tuesday, March 2, 2021 6:07:50 PM

CAUTION: This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Please keep the #55 MBTA bus route. This is a necessary means of transportation for those of us living in the Fenway area that need to work or go to Copley or Downtown. Once offices open up again this is a very busy bus line for both workers and for seniors in the area. It's a long walk for some of the residents to have to go to the train instead or #39 bus.

From: [Jacqueline Royce](#)
To: [MBTA Advisory Board - Fenway, Fen \(2021\)](#)
Cc: [mbta@mass.gov](#)
Subject: EEA Project #18204
Date: Friday, March 5, 2021, 5:00:08 PM

CAUTION: This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

PLEASE CONTINUE SERVICE ON BUS #55 for the attached reasons. I use this bus very often.

Sincerely,
Jacqueline Royce
780 Boylston St.
Boston, MA 02199
617-266-3608

- The residents, especially seniors, those with mobility challenges, and those without access to a car, who rely on the #55 bus to get to important resources within and outside of their neighborhood. Many of these folks can't get safely to more distant T stops, especially due to the major roads that ring the West Fenway.
- The use of the #55 bus by the neighborhood when the Green Line train is overcrowded during games and events at Fenway Park, and during rush hour. It's vital for our shared public health that residents can safely use public transit as events begin again and businesses reopen.
- Lack of access to the #55 puts many seniors at increased risk of isolation. Massachusetts must provide public goods and services, including public transportation, that allow its seniors to age in place in the communities they know and love.
- Many of the residents of the Fenway, including the residents of St. Cecilia House, have stayed home over the last year and are primary speakers of Cantonese or Russian. This means they haven't had a real opportunity to comment on the #55 bus suspension and other MBTA cuts.
- Many new residents of the Fenway have moved into the neighborhood for its transit access and are depending on the #55 bus to get them to and from work and services in the Fenway and the Back Bay, especially when in-person work returns to full capacity.
- Treating public transit as a business, rather than a public good, is short-sighted and will have harmful implications on our neighbors, our City, and our planet.
- The MBTA Advisory Board's December 2020 report advised against the elimination of service and offered a path forward to continue providing this essential public good without major service cuts. The MBTA should take this approach, especially given the major federal funding it received after deciding on the cuts.
- Too many times we've allowed the Governor and MBTA's budgetary decisions to exacerbate the inequality in transit access for our vibrant and diverse communities, including the senior community, and we must not let this happen again.

