



October 29, 2006

Mr. Robert Golledge, Secretary
Executive Office of Environmental Affairs
Attn: MEPA Office
100 Cambridge Street
Boston, MA 02114

RE: Silver Line Phase III Notice of Project Change (EOEA No. 6826/11707)

On October 2, 2006, the MBTA filed the above-reference document, to add a fourth alternative for its Silver Line bus rapid transit portal, the Charles Street Modified Alignment. Based on our current assessment, the Ellis South End Neighborhood Association does not believe this alignment represents a significant improvement over the three previously-proposed alternatives. Each of those was - and is - strongly opposed by the affected neighborhoods of the South End, Bay Village, Chinatown and Back Bay.

The Charles Street Modified Alignment seems to re-locate the bus portal's adverse impacts, putting a greater burden on Bay Village and Chinatown, without addressing fundamental flaws in the Phase III plan. Among them:

- It will make traffic in the area worse, not better, in this case by bringing 60-foot buses into contra-lanes along Marginal Road and Herald Street between Tremont and Washington Streets. The contra-lanes will reduce the capacity of these streets, increase congestion and create new pedestrian hazards around the Josiah Quincy School.
- It will put historic buildings, already threatened by low groundwater levels, in jeopardy. Building extensive new bus tunnels in areas of filled land, at any of the proposed portal sites, will require substantial mitigation costs to protect homes and businesses, if that can be done at all, driving up both the project's cost and its risk.
- It will permanently impair the quality of life in residential neighborhoods surrounding the portal, and it will not provide effective replacement service for the ridership communities previously served by the elevated Orange Line.

These comments address only the bus portal. It should be noted, however, that construction of the core tunnel will have multi-year negative effects on the Boston's Theatre District and on the recently re-vitalized Boylston Street and Park Square areas.

As an urban neighborhood we have a vested interest in effective public transportation and in the cost-effective use of our tax dollars. Thus far, Silver Line Phase III bus rapid transit proposals have not met our expectations.

To effectively serve the community, a project of this magnitude must be discussed in an open public process. We urge the MBTA to begin that process now, as it prepares its final environmental impact report, so that residents and taxpayers have genuine input to the project and can reasonably assess its impacts.

Sincerely,

Kathleen Emrich, President

cc: Andrew D. Brennan, Director of Environmental Affairs
Congressman Michael Capuano
Speaker Salvatore DiMasi
Representative Byron Rushing
Councilor James Kelly