



Are you on board?

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September 11, 2018

Via email: Deirdre.buckley@state.ma.us

Secretary Matthew Beaton
Executive Office of Energy and Environmental Affairs
Attn: Deirdre Buckley
100 Cambridge Street, Suite 900
Boston, MA 02114

Re: Request for Advisory Opinion for the South Boston Bypass Road 2018/2019 Pilot Program, #EEA4325

Dear Ms. Buckley,

Thank you for the opportunity to comment on the Request for Advisory Opinion (RAO) for the South Boston Bypass Road 2018/2019 Pilot Program. Boston Harbor Now, and its predecessor, submitted comments for the 2015/2016 pilot program and a member of our team attended the project consultant presentation to the Port Operator's Group in July of this year. Our comments follow.

Project Description

Originally constructed as a mitigation measure associated with the Central Artery Tunnel project, the South Boston Bypass Road (SBBR) was originally offered to mitigate construction traffic, improve truck and commercial service vehicle routes, and reduce commercial traffic from residential areas.

Today, the SBBR continues to be a vital dedicated road for commercial traffic from I-93 Frontage Road to West Service Road and serves as a connection between I-93, Massport Haul Road, and the Ted Williams Tunnel. In total, the road is approximately 1.3 miles long made up of two 12-foot wide travel lanes and 6-foot wide shoulders.

Communication and Public Outreach

According to the project consultants, due to failed communication and public outreach efforts, the 2015/2016 Pilot Program provided limited data on the potential opening of the SBRR to all vehicular access. An important focus for the 2018/2019 Pilot Re-Evaluation Program is to address the communication shortfalls of the previous pilot and expand access to general traffic 24 hours a day.

We commend the project consultant for attending the Port Operator's Group meeting held in July. The proposed simplified roadway messaging system is a good addition to the program. Like the Longfellow Bridge project, we suggest enhancing this effort by incorporating digital communication efforts such as email newsletters, twitters alerts, and Facebook updates to ensure the public receives periodic reminders and updates about the project.

Regular updates, especially after each of the four pilot periods, should be offered to interested stakeholders—this includes members of the South Boston waterfront community, the maritime industry, and private residential, business, and development.

Effects on the Working Waterfront

The pilot program will also affect the maritime and marine industrial related businesses located within the South Boston Designated Port Area (DPA), especially those dependent on established truck routes—the lifeline of Conley Container Terminal and Boston's working port.

Boston does not benefit from an existing railway system. Moving goods in and out of the city in a timely and efficient manner depends entirely on the trucking system and its dedicated routes. Due to significant investment by Massport and collaboration with the trucking industry, cargo operations at Conley Terminal are able to load a truck and get it on the road in just over 30 minutes. In lieu of exclusive rail right-of-ways, truck routes enable goods from the port to move through and out of the city safely and efficiently.

Expeditious trucking operations keep the Port of Boston competitive and provide the much-needed edge to outperform nearby ports. If trucks are negatively impacted by congestion or even by the limits on their speed and maneuverability as they share space with other types of vehicles and vulnerable road users, it hinders the effectiveness of the port and its operations. It is true that the effects of maritime activity and trucking operations are felt locally but, it is more significant, that the benefits of these systems extend outside of Massachusetts to the New England region and beyond.

Limited Scope

As presented in the RAO, and confirmed by the BPDA, there are 9.5 million square feet of commercial real estate available in the Seaport district with an additional 6.1 million square feet under construction. We understand the strong desire to explore alternatives that help alleviate the intensifying congestion problem in South Boston. We support expanding options and

implementing solutions that embrace more efficient and environmentally-friendly ways of moving workers and residents in and out of the South Boston waterfront.

The proposed pilot program facilitates only automobile travel and eases single-occupancy vehicular travel into the district. It is inconsistent with state and city efforts to meet climate reduction goals by supporting improvement in active transportation options that support residents and workers choosing walking, cycling, or transit to travel into, out of, and within this district. These strategies should be prioritized to reduce the number of single occupancy vehicles on the now-congested roadways. As it reads, this pilot program is a narrowly-focused effort that is likely to attract more single-passenger vehicles to an area already experiencing heavy congestion and transportation pressures. There are other pilot projects that can support improved transit access that should be prioritized.

Recommendations

The pilot program needs a few clear metrics and a set of goals that goes beyond the efficient movement of cars on the SBBR. For automobiles, the pilot should not only monitor the effects of lifting access restrictions along the SBBR but should also account for any effect—positive or negative—the program has on roadways beyond it to determine if it is alleviating or contributing to congestion on surface streets. Further, a decision to alter the existing restrictions should be based on a cost versus benefit analysis and ensure that any cost to the maritime industry has a justifiable benefit for a much larger section of the community. Impediments to the safe and efficient movement of goods from the port should be monitored and reported. Finally, in an effort to move a greater number of people into and out of the district, an array of active transportations pilots recommended by the South Boston Waterfront Sustainable Transportation Plan, Go Boston 2030, and other planning initiatives should be implemented and tested.

Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in dark ink, appearing to read "Jill Valdes Horwood". The signature is fluid and cursive, with a prominent horizontal stroke across the middle.

Jill Valdes Horwood
Director of Policy