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September 20, 2018

Via email: Focus40@dot.state.ma.us

Massachusetts Department of Transportation
Attn: Jennifer Slesinger
10 Park Plaza, Suite 4150
Boston, MA 02116

Re: Comments on the Summer 2018 Draft of the Focus40 Plan

Dear Ms. Slesinger,

Thank you for the opportunity to comment on the summer 2018 draft of *Focus40: The 2040 Investment Plan for the MBTA*. Boston Harbor Now is working in partnership with MassDOT and other state agencies and authorities to envision a more robust water transportation network and to develop business plans for new routes. We want to be sure that this vision for the MBTA captures the full potential of improved and expanded ferry service over the next two decades. What the MBTA wants to commit to achieving and the larger system vision that it hopes to support should be clear.

“Reliable, robust, and resilient” are listed as the aspirational qualities of regional transit service, and ferries are an important component in realizing each of these traits. The MBTA’s existing ferry service has the best on-time performance of any mode in the system and an impeccable safety record. A large and diverse ferry fleet can provide an important transportation option in the aftermath of natural and manmade disasters and make the broader transportation system more resilient. Most importantly, a ferry system that is integrated with other forms of transit from trains to buses to bike share creates a more robust ecosystem of alternatives to driving and attracts a greater number of riders to the MBTA.

In the section on the Blue Line, there is a specific note that the service will soon be over capacity between Maverick and Downtown. An MBTA ferry service between Lewis Mall and Long Wharf would provide more robust transit service for residents of East Boston and provide a layer of resilience when the rail line is delayed or not operating.

We commend the report for its depiction of a better integrated and more accessible ferry system with improvements that include improving schedules to facilitate transfers, Complete Streets designs to better access ferry docks with more modes, and enhanced way-finding.

The overarching vision for water transportation in 2040 should clearly articulate that there would be new ferry services beyond the existing routes and that there may be additional stops on the routes that exist. These routes would inherently attract and serve more passengers and destinations – a projected 800,000 to 1.4 million additional riders would be served annually just by the two business plans that we've been developing. Each service should be linked to an existing MBTA or other public transit service, whether it is a bus or a train, as well as to bike share.

While it's possible that the future service will be contracted out to more than one operator and that some new private services such as the water shuttles from the Encore Boston Harbor will emerge, there are likely to be additional services that would function best if they were fully integrated into the MBTA system. "Multi-operator" is not a metric for success in a future water transportation system, and it is not clear what it means in the context of this document. While Boston Harbor Now supports the diversity of water transportation available today – from ferries to water taxis to the ICA water shuttle to the launch services that cater to particular restaurants – and wants this diversity to continue, there is a distinct need to provide regularly scheduled, year-round, ADA-accessible, fare-integrated, transit service with ferries that will likely require public sector involvement even if it is not incorporated into the MBTA service. The MBTA should be clear about the expansion they want to achieve in this document, and reference, if applicable, how they would support non-MBTA water transportation options with connections to the MBTA's services.

Leveraging state and federal funds to purchase vessels that meet the needs of specific routes enables the MBTA to do one or more of the following: to contract services more efficiently and creatively, incorporate new hybrid diesel/electric engines that can cut down on fuel costs, or provide customers with an increased range of accessibility features. Even with public-private partnerships and a continuation of privately operated services, we strongly encourage the MBTA to expand their vessel fleet.

Finally, we hope to see some minor corrections to document in its final form. The total number of the MBTA ferry riders in 2016 exceeded 1,480,000. This is larger than the number given and does not include the more than 500,000 passengers who use other ferry services in Boston Harbor on an annual basis. Additionally, we hope that one of the MBTA's outstanding new vessels will be featured in one of the images. While we eagerly await the new Red and Orange Line cars, the Champion and the Glory are already here, carrying passengers on a daily basis.

Thank you for the opportunity to comment.

Sincerely,



Alice Brown
Director of Transportation