



September 13, 2011

David Mohler, Chair  
Transportation Planning and Programming Committee  
Boston Region Metropolitan Planning Organization  
State Transportation Building  
10 Park Plaza, Suite 4150  
Boston, MA 02116

RE: Draft Long-Range Transportation Plan, *Paths to a Sustainable Region*

Dear Mr. Mohler,

The Regional Transportation Advisory Council (Advisory Council) is an independent group of citizen and regional advocacy groups, municipal officials, and agencies charged by the Boston Region Metropolitan Planning Organization (MPO) with providing public input on transportation planning and programming. The Advisory Council has been involved in the development of the Long-Range Transportation Plan (LRTP) throughout the last two years. The Advisory Council's Plan Committee met to discuss the Plan on six occasions since March of 2010 and the outcomes of those meetings are the foundation of the comments that follow.

The Advisory Council supports projects and programs that will bring about a sustainable region envisioned by the LRTP. Decades of expansion have created a transportation system with such overwhelming maintenance needs that further expansion to support our economy and quality of life is nearly impossible without deferring critical maintenance. The region continues to depend heavily on automobiles despite compelling evidence of climate change and an uncertain future for fuel costs. Too many people continue to be hurt or die in preventable transportation accidents. More funding is needed for the regional transportation system and the current national financial crisis promises to exacerbate this problem, rather than help solve it. These problems call for change and we commend the MPO for recognizing these issues and studying them through the Needs Assessment conducted for the Long-Range Transportation Plan.

However, more can and needs to be done to address these problems. The MPO's policies that guide investments in the transportation system can go further to ensure the necessary change happens. Many of the policies are broad and in some instances contradictory. The Advisory Council recommends the following policy preferences that can help the MPO make the difficult, but necessary, tradeoffs that are unavoidable in transportation planning.

First, the Advisory Council agrees with the MPO that maintenance of the existing system must be the highest priority. Transportation is the circulatory system of our economy. Too much labor

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and funding has gone towards developing our existing system of roads, bridges, transit, ports, and paths to let it crumble as more attractive expansion projects are pursued.

However, the Advisory Council also recognizes that the region will continue to grow and more people will put further strain on the system. Judicious expansion will be necessary. When there is funding available for expansion, the MPO should favor rail, transit, bicycle, and pedestrian projects over highway projects. These are more sustainable modes for accommodating growth in the movement of people and goods. We are not opposed to highways, but support programs and projects to use the system more efficiently rather than simply adding lanes.

Additionally, the Advisory Council urges the MPO to use quantifiable performance measures to determine which projects are the best to fund. There are simply not enough funds to construct all of the projects that are proposed. In the absence of data-driven decisions, political considerations take precedence. The MPO should seek to quantify and qualify the costs relative to the benefits of each project. This work should take into consideration economic development, environment and greenhouse gas emissions reduction, public health, congestion, and safety costs and benefits among others.

A summary of the most important guidance we have for the MPO is:

- Maintenance of the existing system should be the highest priority. The MPO should set a percentage of funds to dedicate to maintenance and adhere to it, even when funding is reduced. We are concerned that only 42 percent of the highway funds at the MPO's discretion are left unassigned to projects in the LRTP. This means less money will be available each year in the Transportation Improvement Program to allocate towards maintenance, modernization, and operational efficiency projects all around the region.
- The Advisory Council encourages the MPO to prioritize transit, rail (passenger and freight), bicycle and pedestrian projects over highways for expansion of the system.
- Project selection should be primarily on the basis of statistical data and performance measures describing existing conditions. Project proposals should include predicted improvements. Subsequent to the project's completion, a final study should be conducted to ensure the anticipated benefits were realized and so that lessons learned can be applied to similar projects in the future. Before-and-after studies should also look at the larger transportation system to understand if unexpected benefits or problems developed as a result of the project. The MPO's TIP Before-and-After Evaluation study in the federal fiscal year 2012 Unified Planning Work Program is a good start and we will support more work of this nature in the future.
- The MPO should include illustrative projects in the Long-Range Transportation Plan so that it can express a more compelling vision of the future to the public and Legislature. Among the projects that could produce such a compelling vision are the Urban Ring, the Blue Line Extension to Lynn, the Red Line-Blue Line Connector, the North-South Rail Link, and electrification of the commuter rail system.

In addition, the Advisory Council also has several suggestions specific to the various modes and freight distribution. They are summarized below.

### **Transit**

Transit will continue to play a key role in the region's transportation mix, especially given the anticipated aging of the population and the limits to highway expansion. We have the following suggestions for transit in *Paths to a Sustainable Region*.

- The Advisory Council supports the MPO's decision to flex highway funds to transit, as it has done for Phase II of the Green Line Extension. This allows the MBTA to focus all of the federal transit funds coming into the region on maintenance.
- We are concerned about the deferral of the entire Green Line Extension project and if more funding would expedite the project, we would like the MPO to consider flexing highway funds to construct it. We urge MassDOT, the MBTA, Somerville, and Medford to work together to get the project back on track.
- Closing gaps in the existing network should be a priority when adding to the system.
- Emerging plans for high-speed rail in the Northeast must be taken into consideration in highway and transit project development so as to facilitate the envisioned improvements. The MPO should actively support infrastructure improvements that would allow the speeds needed for true high-speed rail.

### **Freight**

The Advisory Council has long been a proponent for better freight planning in the Boston region. Our economy and quality of life are directly impacted by the ease with which freight moves. Eastern Massachusetts is heavily dependent on trucks, which has detrimental effects on the condition and safety of our roads and the prices of the goods we need. We have the following suggestions for freight in *Paths to a Sustainable Region*.

- The LRTP should include a chapter dedicated to freight movement.
- The freight benefits and drawbacks of each project in the LRTP should be identified and then discussed in the project description.
- Investments in freight rail infrastructure, whether shared with passengers or exclusively for freight, should be supported when they will result in significant public benefits derived from the diversion of freight from trucks to rail.
- Four expansion projects recommended by the Advisory Council's Freight Committee would offer substantial benefits to freight distribution in the region. These are the Conley Terminal Bypass Road and extension and rehabilitation of Track 61 in South Boston, improvements to the CSX rail line between Framingham and Mansfield, and a truck stop along Interstate 495 between Westford and Interstate 90 with electric plug-ins and other modern features. We appreciate the MPO's inclusion of the Conley Terminal Bypass Road in the LRTP.

### **Highways**

While the Advisory Council favors the expansion of other modes over highways, we recognize the importance of the current roadway network. We urge the MPO to support and study ways in

which the existing system can be managed for increased efficiencies that will improve safety and reduce congestion and fuel consumption. We have the following suggestions for highways in *Paths to a Sustainable Region*.

- The Advisory Council supports a high-occupancy vehicle lane system and other tools that will improve the efficiency of the region's highways, and provide incentives for carpooling. We look forward to reviewing the MPO's HOV study that is now underway.
- Some of the major interchange projects are largely modernization projects and should be identified as such.

### **Pedestrian and Bicycle**

The MPO strongly supports the expansion of healthy transportation options, especially in light of the emerging threats from climate change and obesity. A tremendous expansion of this infrastructure could be achieved simply by using space on our existing roadways better. Shared-use paths are a more expensive but effective way to also support healthy transportation. However, the Advisory Council urges the MPO to develop a stronger set of criteria for evaluating shared-use paths. We have the following suggestions for bicycle and pedestrian investments in *Paths to a Sustainable Region*.

- Invest in roadway projects only if they support the needs of all street users.
- Establish criteria for the evaluation of shared-use paths so that projects that will receive the most use and do the most to remove automobiles from streets are given priority. We offer the following suggestions for criteria considerations:
  - Number of transit users that will use the path to access a transit station
  - Number and size of activity centers connected by the path
  - Number of cars removed from the roads
  - Will the path be lighted?
  - Will the path be cleared of snow?
  - Level of community support
  - Economic and social impacts of the path

In conclusion, the Advisory Council commends the MPO for the difficult work and decisions that went into developing *Paths to a Sustainable Region*. While we have offered some overarching guidance for the future, we realize your work is difficult and there are many stakeholders involved. We also recognize the severe fiscal constraint under which the LRTP was developed. We look forward to working with you on the next plan and are prepared to support the difficult choices necessary to move us towards a more sustainable future.

Sincerely,



Laura Wiener, Advisory Council Chair



Schuyler Larrabee, Plan Committee Chair