

## *Paths to a Sustainable Region*

### **Public Comments and Proposed Staff Recommended MPO Responses by Theme**

#### **GREEN LINE DELAY**

The MPO received over 145 comments from the public regarding the Green Line Extension Delay. They fell under three specific themes. They are as follows:

**Comment:** The delay of the Green Line Extension is unacceptable. The Green Line is a legal commitment under the State Implementation Plan and the Transportation Conformity for the LRTP and TIP. The MPO should reject the delay.

**Proposed Response:** The extension of the Green Line to Medford Hillside (College Avenue)/Union Square is part of the Commonwealth's Department of Environmental Protection's (DEP) Air Pollution Control Regulations codified in 310 CMR 7.36 – Transit System Improvements. Because the Green Line to Medford Hillside (College Avenue)/Union Square Extension project is a legal commitment, the Boston Region MPO has included it in its Long-Range Transportation Plan and Air Quality Conformity Determination (LRTP). The Boston MPO must include any new project over \$10 million that uses federal transportation funds, any project that adds capacity to the transportation system, and/or any project that is included as a Transportation Control Measure (strategies to reduce emissions of air pollutants) as part of the State Implementation Plan (SIP) in its LRTP.

The Green Line to Medford Hillside (College Avenue)/Union Square Extension project is being studied and designed by the Massachusetts Department of Transportation (MassDOT) and the Massachusetts Bay Transportation Authority (MBTA) and funded using Commonwealth or New Starts funds. The MPO felt that it was important to further extend the Green Line from Medford Hillside (College Avenue) to Route 16/Mystic Valley Parkway as a second phase of the Green Line Extension project, and "flexed" \$185 million of federal funding dedicated to highway projects to do so. Flexing of this type is at the discretion of the MPO. The Medford Hillside (College Avenue) to Route 16/Mystic Valley Parkway segment of the Green Line Extension project is not part of the SIP commitment.

310 CMR 7.36 (4) states that SIP projects may be delayed beyond their established deadlines. For delayed projects, MassDOT must implement interim emission reduction offset measures during the period of delay. These measures, which must be in place by December 31, 2014 (the legal deadline for the construction of the Green Line Extension), must provide an air quality benefit that is equal to that anticipated from the construction of the Green Line Extension. MassDOT submitted its annual SIP Status Report to the DEP on July 27, 2011. The report is available at [www.mass.gov/massdot/sip](http://www.mass.gov/massdot/sip). In that report, MassDOT announced there would be a substantial delay past 2014. MassDOT is currently working with the Central Transportation Planning Staff (the staff to the MPO) to calculate the air quality reductions projected for the Green Line for the period of anticipated delay.

Once that analysis is complete, MassDOT and the MBTA will develop a portfolio of interim measures that meet the air quality threshold. Once a set of measures is approved by DEP, the Boston MPO will

amend the LRTP to list the interim measures and identify their sources of funding. Since the Green Line Extension to Medford Hillside (College Avenue)/Union Square has a deadline of 2014, there is time to identify the measures, submit them for public review and DEP approval, and amend them into the LRTP. Until that time, the Boston MPO will continue to carry the Green Line Extension project in the LRTP, assuming that any interim project(s) will provide equal or greater air quality benefits to the region.

**Comment:** Full Funding of the Green Line Project and any interim replacements must be identified in the Boston MPO 2012-2015 Transportation Improvement Program and in the Long-Range Transportation Plan.

**Proposed Response:** The Green Line Extension to Medford Hillside (College Avenue)/Union Square project is being funded by the Commonwealth, with funding that is not at the discretion of the MPO. Nevertheless, the MPO felt that it was important to further extend the Green Line from Medford Hillside (College Avenue) to Route 16/Mystic Valley Parkway, and “flexed” \$185 million of highway funding to do so (the flexing of funds is at the discretion of the MPO). The Medford Hillside (College Avenue) to Route 16 section of the project is not part of the SIP commitment.

For the Green Line Extension to Medford Hillside (College Avenue)/Union Square portion of the project, MassDOT is pursuing federal funding – through the competitive New Starts program managed by the Federal Transit Administration – to support the design and construction of the Green Line Extension. In January of 2010, MassDOT and the FTA initiated formal collaboration on the development of a complete New Starts application for the Green Line Extension project. The final New Starts application materials are in progress, and need to be finalized for FTA review. In addition to the use of any federal funding, MassDOT and the MBTA will use Commonwealth funds to support the design and construction of the Green Line Extension project. These funds will be raised with the backing of authorizations made to support the SIP projects in Transportation Bond Bills of the past several years. At present, MassDOT has \$800 million (less funds already spent on planning, design, and construction) in active Transportation Bond Bill authorizations for the SIP projects. As needed, MassDOT will seek additional Transportation Bond Bill authorization to cover the costs of the Green Line Extension project. This information is identified in Chapter 7 (The Financial Plan) of the LRTP. The funding that is projected for the first four years of the project is included in the 2012-2015 Transportation Improvement Program.

**Comment:** The Green Line to Route 16 must be funded because it is a State Implementation Plan legal commitment.

**Proposed Response:** The legal commitment is to construct the Green Line to Medford Hillside (College Avenue) with a spur to Union Square. The MPO felt that it was important to further extend the Green Line from Medford Hillside (College Avenue) to Route 16/Mystic Valley Parkway as a second phase of the Green Line Extension project, and “flexed” \$185 million of funding dedicated to highway projects to do so. Flexing of this type is at the discretion of the MPO. The Medford Hillside (College Avenue) to Route 16/Mystic Valley Parkway segment of the Green Line Extension project is not part of the SIP commitment.

### SOMERVILLE COMMUNITY PATH

**Comment:** Delaying the Green Line project also delays the Community Path. Full funding of the Community Path should be programmed in the Boston MPO 2012-2015 Transportation Improvement Program and in the Long-Range Transportation Plan. (One letter included 324 attached requests to include the Community Path in the final Long-Range Transportation Plan (LRTP) Strategy.)

**Proposed Response:** The design and the cost of design for the proposed extension of the Community Path are included as part of the Green Line Extension to Medford Hillside (College Avenue)/Union Square project; however, this is not part of the State Implementation Plan Improvement. As part of Paths to a Sustainable Region, the MPO was required to update project costs and revise the financial assumptions in the Long-Range Transportation Plan (LRTP). While the MPO worked to use its available funding in a way that produces the optimal benefit, many projects that would help to maintain the existing system and also allow for future expansion or enhancement could not be included in the fiscally constrained LRTP.

The MPO intends to continue working with state and federal partners to identify additional transportation funding in order to be prepared for the future. This project will remain in the Universe of Projects list and will be considered during the development of the next LRTP.

### RED LINE/BLUE LINE CONNECTOR

**Comment:** Appalled by the state's proposal to abandon the Red Line/Blue Line Connector.

**Proposed Response:** The design of the Red Line/Blue Line Connector is part of the Commonwealth's Department of Environmental Protection's (DEP) Air Pollution Control Regulations codified in 310 CMR 7.36 – Transit System Improvements. Because the design of the Red Line/Blue Line Connector is a legal commitment, the Boston Region MPO has included it in its Long-Range Transportation Plan and Air Quality Conformity Determination (LRTP). The Boston Region MPO must include any new project over \$10 million that uses federal transportation funds, any project that adds capacity to the transportation system, and/or any project that is included as a Transportation Control Measure (strategies to reduce emissions of air pollutants) as part of the State Implementation Plan (SIP) in its LRTP. MassDOT has petitioned the Department of Environmental Protection (DEP) to nullify the commitment to perform final design of the Red Line/Blue Line Connector, due to the unaffordability of the eventual construction of the project. MassDOT is initiating a process to amend the SIP to permanently and completely remove the obligation to perform final design of the Red Line/Blue Line Connector. The Boston MPO is awaiting the results of MassDOT's proposal and will revise its LRTP once their request has gone through the DEP's process.

### BRUCE FREEMAN/ASSABET RIVER RAIL TRAILS

**Comment:** The MPO received 13 comments opposing the Bruce Freeman Rail Trail project. They feel that the Trail is a poor prioritization of transportation funds, will not reduce emissions, and will not increase transportation capacity. They feel that it will be used more for recreational purposes.

**Proposed Response:** Through the visions and policies set forth in the LRTP for the MPO, it was determined that bicycle and pedestrian projects are important to the MPO. Several of the vision topics address this. Specifically, bicycle and pedestrian facilities are addressed under its livability (promote healthy transportation), mobility (improving access to transit, expanding bicycle and pedestrian networks), environment (support nonmotorized modes, supporting greenhouse gas emission reductions), and climate change (increase transit/bicycle/pedestrian options) visions and policies.

In discussing the projects to be funded in the LRTP, the MPO sought to fund projects across transportation modes to support a transportation system that expands travel options. This particular mix of projects allowed the MPO to continue prior commitments, and achieve a modal split among roadways, strategic transit, and bicycle and pedestrian projects.

**Comment:** The MPO received 5 comments supporting the Bruce Freeman Rail Trail/Assabet River Rail Trail projects.

**Proposed Response:** The Bruce Freeman Rail trail Project is included in the list of recommended projects in *Paths to a Sustainable Region* in the 2021-2025 time band. The Assabet River Rail trail Project is included in the list of recommended projects in *Paths to a Sustainable Region* in the 2016-2020 time band.

#### **NO CHANGE IN STRATEGY – CURRENT APPROACH**

**Comment:** The LRTP has admirable goals of developing sustainable, green transportation, but the project selection demonstrates a commitment to more of the same. The “Current Approach” strategy is not the most effective strategy for identifying projects that best satisfy the visions and policies adopted in the LRTP. There is a disconnect between the Needs Assessment and the LRTP projects.

**Proposed Response:** The MPO included the development of a regional Needs Assessment as part of *Paths to a Sustainable Region*. The Needs Assessment revealed a tremendous number of maintenance, safety, and capacity issues that needed to vie for scarce transportation funds available to address them. In discussing the projects to be funded in the LRTP, the MPO sought to fund projects across transportation modes to support a transportation system that expands travel options. This particular mix of projects allowed the MPO to continue prior commitments, and advance a modal split among roadways, strategic transit, and bicycle and pedestrian projects. The MPO left 41 percent of the available funds unassigned to fund lower-cost, non-regionally significant projects that do not have to be specifically listed in the LRTP. It is with this funding that lower cost projects can be programmed in the Transportation Improvement Program (TIP) and constructed in the future. The MPO will continue to use its visions and policies to promote sustainable, green transportation (which include livability, mobility, environment, and climate change) to select projects using the unassigned funds.

#### **ILLUSTRATIVE PROJECTS**

**Comment:** The LRTP misses the opportunity to prioritize important projects to address gaps in service and that could be advanced in better financial times.

**Comment:** The LRTP should include a listing of “Illustrative Projects,” including:

- Urban Ring (addresses environmental justice issues)
- Silver Line Phase III (addresses environmental justice issues)
- Continued design of the Red Line/Blue Line Connector (addresses environmental justice issues)

It is important that projects be programmed and ready to proceed if funding becomes available.

**Proposed Response:** The MPO recognizes that there are a tremendous number of maintenance and capacity issues vying for scarce transportation funds. It also recognizes that there are many mobility and capacity issues now and projected for the future. The MPO chose not to include an Illustrative Projects chapter in this LRTP, listing projects that they would fund if new funding would become available because there is a significant backlog of maintenance and state-of-good-repair work to be done on the highway and transit system. The LRTP must be updated at least every four years. As new financial information becomes available, the MPO will update in subsequent LRTPs, its list of recommended projects.

### EXPANSION OF TRANSIT

**Comment:** The LRTP needs to include the expansion of transit services to address issues identified in the Needs Assessment, particularly future demand, gaps in public transportation, and circumferential travel in the Central Area (particularly the Urban Ring).

**Proposed Response:** In discussing the projects to be funded in the LRTP, the MPO sought to fund projects across transportation modes to support a transportation system that expands travel options. This particular mix of projects allowed the MPO to continue prior commitments, and advance a modal split among roadways, strategic transit, and bicycle and pedestrian projects. The MPO acknowledges the need for increased transit in the future; however, it also recognizes the significant backlog of maintenance and state-of-good-repair work for the existing transit system. The MPO chose to allocate all of the MBTA’s future transit and capital funding to system infrastructure maintenance, accessibility improvements, and system enhancements to ensure that the existing system can continue to function into the future and continue to serve its existing ridership. The Commonwealth made the commitment to fund the State Implementation Plan transit expansion projects. The MPO felt that it was important to further extend the Green Line from Medford Hillside (College Avenue) to Route 16/Mystic Valley Parkway as a second phase of the Green Line Extension project, and “flexed” \$185 million of federal funding dedicated to highway projects to do so.

### GREENHOUSE GAS REDUCTIONS

**Comment:** The LRTP does not go far enough to further the goals of the Global Warming Solutions Act.

**Proposed Response:** In discussing the projects to be funded in the LRTP, the MPO sought to fund projects across transportation modes to support a transportation system that expands travel options. This particular mix of projects allowed the MPO to advance a modal split among roadways, strategic transit, and bicycle and pedestrian projects. The MPO chose to allocate all of the MBTA’s future transit

and capital funding to system infrastructure maintenance, accessibility improvements, and system enhancements because of the significant backlog of maintenance and state-of-good-repair work for the existing transit system to ensure that the system can function into the future and continue to serve existing ridership. The Commonwealth made the commitment to fund the State Implementation Plan transit expansion projects. In addition, the MPO felt that it was important to further extend the Green Line from Medford Hillside to Route 16/Mystic Valley Parkway as a second phase of the Green Line Extension project, and “flexed” \$185 million of funding dedicated to highway projects to do so.

The MPO left 41 percent of the available funds unassigned to fund lower-cost, non-regionally significant projects that do not have to be specifically listed in the LRTP. It is with this funding that lower cost projects that can help to reduce CO<sub>2</sub> emissions can be programmed in the Transportation Improvement Program (TIP) and constructed in the future. The MPO will continue to use its visions and policies to promote sustainable, green transportation (which include livability, mobility, environment, and climate change) to select projects using the unassigned funds. The MPO contributes to reductions in greenhouse gas emissions through the TIP by funding projects and programs that reduce the need to drive and ease roadway congestion. It funds projects that support the use of alternative fuel sources. Many of its programs (funded through the MPO’s Unified Planning Work Program) that promote livability in the region also help in reducing greenhouse gas emissions. Some of these include livability workshops held in MPO communities and support for local pedestrian and bicycle planning to improve conditions for these modes in the region, and the community technical assistance program. A full list of the MPO’s activities can be found in Chapter 5 of the LRTP.

Working closely with MassDOT, the Boston Region MPO will continue to report on its actions to comply with the GWSA and to help meet the GHG reductions targets. As part of this activity, the MPO will provide further public information on the topic and will advocate for steps needed to accomplish the MPO’s and state’s goals for greenhouse gas reductions. The MPO will continue to analyze projects for their reductions either through its regional model or at a project level when it is preparing its TIP or conducting project-level studies.

### PROJECTS THAT SHOULD BE INCLUDED IN THE LRTP

**Comment:** The LRTP does not include the following projects:

- Route 3 South (The MPO did identify this project as meeting a regional need, however due to financial constraints did not include this project in the recommended LRTP.)
- I-495/I-290/Route 85 (should be re-evaluated to score under the livability, environment, and climate change visions)
- New Interchange and system of frontage roads, including Green Street, between Routes 20, 117, and 128 in Waltham

**Proposed Response:** As part of Paths to a Sustainable Region, the MPO was required to update project costs and revise the financial assumptions in the Long-Range Transportation Plan (LRTP). While the MPO worked to use its available funding in a way that produces the optimal benefit, many projects that

would help to maintain the existing system and also allow for future expansion or enhancement could not be included in the fiscally constrained LRTP. In discussing the projects to be funded in the LRTP, the MPO sought to fund projects across transportation modes to support a transportation system that expands travel options. This particular mix of projects allowed the MPO to continue prior commitments, and achieve a modal split among roadways, strategic transit, and bicycle and pedestrian projects.

The MPO intends to continue working with state and federal partners to identify additional transportation funding in order to be prepared for the future. These projects will remain in the Universe of Projects list and will be considered during the development of the next LRTP.

### PROJECTS THAT SHOULD BE INCLUDED IN THE NEEDS ASSESSMENT

**Comment:** The Needs Assessment should include specific projects as meeting a regional need.

**Proposed Response:** The MPO included the development of a regional Needs Assessment as part of *Paths to a Sustainable Region*. The Needs Assessment revealed a tremendous number of maintenance and capacity issues by corridor that needed to vie for scarce transportation funds available to address them. In addition, all of the projects that were identified through various methods (past LRTP project, public comment, and UPWP or Congestion Management Process recommendation, etc.) were included in the Universe of Projects. Staff then reviewed all of the projects in the Universe List to determine if each project addressed a regional need based on a number of criteria. For example roadways were included as bottlenecks if they were identified by at least two of the three methods used in the analysis and a project was listed as a regional priority for safety if it was identified in the top crash locations in the region. The project was not listed as meeting a regional need if it did not meet one of these criteria. The projects listed in the Universe List may meet a need at the corridor level but not at the regional level.

### PROJECTS INCLUDED IN OTHER MPO'S

**Comment:** The Boston MPO should share in the funding of the I-495/I-90 and I-495/Route 9 Interchanges.

**Proposed Response:** The Metropolitan Area Planning Council, which is a member agency of the Boston Region MPO, is coordinating with the Central Massachusetts Regional Planning Council on issues along the I-495 corridor. The Boston Region MPO recently approved a work scope to support MassDOT in conducting a study to evaluate these I-495 interchanges. The Boston Region MPO will provide technical assistance and attend stakeholder meetings. The Central Massachusetts MPO has committed to funding the construction of these projects once the study and design is completed.

### TIME BANDS OF PROJECTS CHANGED

**Comment:** The following projects proposed construction have been moved to a later date. During TIP discussions, the City of Woburn asked for these projects to be moved forward. The LRTP leaves 42% of the funding unassigned; however in working drafts of the LRTP, 26% of the funding was left unassigned.

This leaves the projects stuck in a queue. This was done without significant deliberation and consideration. There are concerns about the process that was used. Please move them back.

- New Boston Street Bridge
- Montvale Avenue

**Proposed Response:** The MPO has considered your request and has decided to keep its currently planned schedule for implementing these projects. In discussing the projects to be funded in the LRTP, the MPO sought to fund projects across transportation modes to support a transportation system that expands travel options. This particular mix of projects allowed the MPO to continue its prior commitments, and advance a modal split among roadways, strategic transit, and bicycle and pedestrian projects. The MPO chose to leave the higher percentage of 41 percent of the available funds unassigned to fund lower-cost, non-regionally significant projects that do not have to be specifically listed in the LRTP because of the significant backlog of maintenance and state-of-good-repair work to be done on both the highway and transit system. These projects will be chosen as part of the Transportation Improvement Program process.

#### REQUEST FOR FINANCE INFORMATION

**Comment:** The LRTP should include additional finance tables providing information on the big picture – total state and total federal funding and where it all goes. It should also include historic information including information on Chapter 90 funding.

**Proposed Response:** The MPO is limited to funding the components of the regional transportation system over which the MPO has programming and geographic jurisdiction. The LRTP includes only funding of federal transportation money for the Statewide Road and Bridge Program, the Central Artery/Tunnel project, the Accelerated Bridge Program, and the public transportation system. The only state funding included in the LRTP is the Commonwealth's commitment to fund projects that cost over \$10 million or State Implementation Plan projects. Chapter 7 of the LRTP shows the federal funds that are available to the MPO to program at their discretion. The MPO is looking into the use of Chapter 90 funds as part of its Pavement Management Study that is currently underway. Your comment regarding historic information on transportation spending can be found in other statewide documents, including the Statewide Capital Investment Plan.

#### PERFORMANCE MEASURES

**Comment:** The MPO should use quantifiable performance measures to determine which projects to fund.

**Proposed Response:** The MPO has committed to develop performance measures as part of the next phase in the LRTP process. Examples of performance measures that will be examined are included at the end of Chapter 4 (Transportation System Operations and Management), Chapter 5 (Livability and Environment), and Chapter 6 (Transportation Equity).