

## June 10 Version

June 12, 2013

David Mohler, Chair  
Boston Region Metropolitan Planning Organization  
10 Park Plaza, Suite 2150  
Boston, MA 02116

RE: Draft Federal Fiscal Years 2014-17 Transportation Improvement Plan and  
Draft Federal Fiscal Year 2014 Unified Planning Work Program

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 reviewed and discussed the two draft certification documents now in circulation for public review and comment: the FFYs 2014-17 Transportation Improvement Program (TIP) and the FFY14 Unified Planning Work Program (UPWP). We offer the following comments on the TIP and UPWP.

### **TIP**

The members of the Advisory Council support the MPO's visions and policies used for selecting projects for the TIP, and recognize its diligence in thoroughly evaluating these projects. We understand the financial constraints that naturally limit the number of projects that can be undertaken in any given year. While we appreciate that there are many factors affecting programming, including project readiness and cost, we would prefer to see the MPO place more weight on project evaluation ratings in its project choices. We observe and find unfortunate that some high ranking and long promised projects have been passed over in the TIP in favor of lower ranking and newer projects because of the difficult task of choosing among so many projects with so little funding.

### **UPWP**

The Advisory Council thinks that understanding the UPWP and evaluating its studies could be improved if its study descriptions included explanations on how study results

will be used, and how resulting recommendations will be implemented. While the Advisory Council realizes that regional studies often contribute to broader impacts than strictly local studies, we stress the importance of ones that are well-defined, implementable, and contribute to identifiable solutions. Sites selected for study should give priority to those that serve the greatest number of residents and workers, address Environmental Justice communities, encourage growth of transit oriented development centers, and help identify and capitalize on reverse commuting opportunities.

## Freight

The Advisory Council continues to strongly support more concerted efforts to understand and promote freight activity in the region. We believe that movement of freight by all means, including highway, local roads, rail, sea, and air, has not yet received the attention it deserves from the MPO. Freight movements by truck are projected to increase significantly in the years ahead, causing severe wear and tear on roads and bridges, and resulting in greatly increased costs, congestion, delays, and travel time, resulting in diminished air quality and overall public health. We are concerned these costs will have a very negative effect on economic growth and competitiveness.

The Advisory Council greatly appreciates the addition this year of what will be an ongoing *Freight Planning Support* program in the UPWP and appreciates its funding from the MPO in the amount of \$36,400. This, along with the previous two freight studies, will provide a good start to the need for understanding freight movement in the region, but more remains to be done in the following areas.

- The MPO's Travel Demand Model does not address other modes of freight movement beyond trucking. The model does not adequately represent and allocate truck movements, volumes, or travel patterns which are needed for analyzing truck impacts and operational issues.
- Future freight studies should investigate and describe the MPO Region's multi-modal freight delivery system and the need to meet demands in all modes, not just trucking. Some of the studies might develop a better understanding of the effects of "Truck to Rail Diversion" and "Short Line Railroads."
- We recommend that the MPO adopt a policy to reduce truck traffic and increase rail freight. We urge the MPO to request creation of a separate and dedicated Freight Division within MassDOT, together with a State Freight Advisory Council to facilitate receiving input from all relevant parties. We further suggest that freight planning be coordinated with other MPOs and other states.

- The Advisory Council strongly recommends studies be undertaken to determine the effects of the Panama Canal Expansion Project (Panamax) on freight movement within, through, and around our region. Post-Panamax ships coming to the east coast starting within a year will be offloading huge amounts of goods and we need to understand the effects this may have on regional freight movement. We should also study the impact of truck traffic flows resulting from the relocation of the Commonwealth's rail hub to Worcester. These two changes will have major impacts on the transportation network in our entire region.
- We are especially concerned that Massachusetts does not seem to be preparing for the substantial increase and impact of heavier freight and more trucks on Routes I-95, I-495, the MassPike, and connecting roads. All this while our ports become increasingly underutilized and non-competitive. We see no studies being undertaken or policies developed to prepare for these changes.

## **Economic Development**

The Advisory Council supports the new UPWP study *Transportation Investments for Economic Development*. We recommend that this study involve the Massachusetts Department of Economic Development and seek its input. Freight movement should be an important part of the Commonwealth's overall economic development strategy.

The Advisory Council suggests that studies of maritime freight and passenger demand and investment should try to include all ports in Massachusetts, whenever feasible.

## **Public Health**

We encourage the MPO to give more attention to the impact of transportation on public health. The Advisory Council is increasingly concerned about air quality and overall health impacts from motor vehicles on bicyclists, pedestrians, and residents. We are concerned that projects funded by the TIP are not yet providing the air quality improvements that we need. We urge more TIP resources be spent on air quality improvements such as encouraging mode shift to water transportation by additional funding for ferries and docks.

## **Green-Oriented Transportation**

- The Advisory Council continues to support planning and construction of pedestrian and bicycle improvements on roadways, bridges, and pathways throughout the region. We are pleased that more trail facilities such as the Tri-Community Bikeway, the South Bay Harbor Trail, and the bikeway connection at Routes 3 and 60 in Arlington are programmed for funding in the draft TIP.

- We support the MPO policy goal of livability and economic benefit, and we encourage a more seamless integration of pedestrian facilities into the overall transportation network. We urge the MPO to encourage and promote local policies that make pedestrian sidewalks and facilities usable throughout the entire year.
- The Advisory Council commends the MPO for its inclusion of the Green Line Extension in the TIP. The completion of this project will enhance the growth of transit oriented development, which is a vital concern to many area residents and businesses.
- We enthusiastically endorse planning and construction activities that enhance transit expansion in our region.
- The Advisory Council promotes accessibility in transportation. Accommodating wheelchair users and others having personal mobility problems must be a priority and this requires adequate sidewalks that are maintained and usable in all seasons.

Advisory Council members are pleased with the staff's public outreach process that generated the Draft TIP and UPWP with all the projects and studies. Public outreach is one of the critical MPO functions funded through the UPWP and we appreciate your continued attention to it.

Sincerely,



Steven H. Olanoff,  
Chair, Regional Transportation Advisory Council