

REGIONAL TRANSPORTATION ADVISORY COUNCIL



August 14, 2019

David Mohler, Chair
Boston Region Metropolitan Planning Organization
10 Park Plaza, Suite 4150
Boston, MA 02116

Re: Draft Destination 2040 Long-Range Transportation Plan

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 with providing public input on transportation planning and programming to the Boston Region Metropolitan Planning Organization (MPO).

The Advisory Council has reviewed and discussed the public review draft of the Destination 2040 Long-Range Transportation Plan (LRTP) and offers the following comments:

- We note the importance of the LRTP for setting overall priorities for the region's investment in transportation. We are supportive of the vision, goals, and objectives stated in the plan and the funding goals for investment programs as shown on page ES-6.
 - We support the continued shift towards Complete Streets, Intersection Improvements, Bicycle and Pedestrian, and Community Connections, while reducing the percentage amount allocated to the Major Infrastructure program.
 - We support the addition of specific goals for flexing funds to transit through the Transit Modernization Program, and the addition of dedicated bus lanes to the Complete Streets program.
 - While we support the decreased allocation to Major Infrastructure, we note that there are a number of Complete Streets projects over \$20 million that are currently included under the Major Infrastructure program. We ask that for the next LRTP, more consideration be given to the definition of project categories, for example, to consider “complete streets” projects that are greater than \$20 million in value as Complete Streets rather than Major Infrastructure. Changes in definitions may also warrant changes to the overall funding goals, for example, additional funding being allocated to the Complete Streets category.
 - We note the importance of the MPO communicating these goals to communities, e.g., through the Transportation Improvement Program (TIP) outreach process, so that the MPO can help communities bring the right projects to the table to support these funding goals. We ask that staff

continue to work to find creative ways to engage with communities and work with MPO Board members to prioritize and allocate resources to these outreach strategies.

- We agree with the MPO’s decision to not identify specific Major Infrastructure projects for funding in the outer time band, but rather leave these decisions to future years. Transportation technologies and objectives are changing rapidly given the advancement of transportation network services, connected and automated vehicles, and electric vehicles, as well as increasing focus on issues such as sustainability and climate change. Twenty years is a long time compared to the rate of this change and it is likely that our priorities and needs will continue to shift before these outer years are reached. It seems prudent to leave flexibility rather than locking in any particular project well before the MPO is ready to make programming decisions.
- The MPO has made great progress towards increasing equity considerations in planning and project selection, but we suggest that more work needs to be done in this area.
 - Equity is part of TIP project evaluation and recently the TIP has included an evaluation of the overall distribution of funding according to different population groups. We suggest that equity priorities be explicitly stated in the LRTP as well. For example, the funding goals could be expanded to include a goal of the overall percent of funding directed to projects supporting or benefiting designated vulnerable populations. We suggest that this goal be ambitious to make up for the additional transportation challenges faced by many disadvantaged communities.
 - The MPO has undertaken an excellent process in the past year to develop a disparate impact and disproportionate burden (DI/DB) policy and meaningful measures for that specific process and federal requirement. Unfortunately, the equity performance report described in Chapter 6 of the LRTP suggests that the MPO will never be able to measure equity impacts with the tools current available. Tables 6-1 through 6-10 suggest that the forecasting error in the regional model is far greater than the impact of the proposed LRTP projects that can be modeled. We would like to see more explanation of how these results were developed and how the forecasting error was defined. We also suggest considering additional or alternative performance measures or measurement methods (e.g., a project-specific “select link” analysis to illustrate who benefits from the projects) that more clearly illustrate the individual and collective equity impacts of the projects proposed in the LRTP.
 - On a related note, we would like to better understand the asserting that the projects identified in the LRTP reduce CO₂ emissions by 218.0 tons per day or about 0.4 percent compared to the 2040 baseline, when the model forecasting error stated in Chapter 6 is in the range of 3 to 17 percent.
- We recognize that the discussion of performance measures and targets in Chapter 5 responds directly to Federal requirements, but nevertheless this chapter appears to be disconnected from the rest of the LRTP. The performance measures are not clearly related to the MPO’s goals, the targets are not related to any MPO-specific analysis, and the two- to four-year time horizon for the targets is much shorter than the LRTP time horizon. In the next plan cycle, we recommend expanding the measures and targets to include other measures that directly align with the MPO’s goals and over which the MPO has more control, as well as expanding the time horizon to be more consistent with the LRTP horizon. Measures and targets should be used to emphasize regional priorities, help identify needs, and evaluate actions to address particular problems.

- We recognize the need to develop a fiscally constrained plan using the best available revenue projections. However, we suggest the MPO is missing an opportunity to be more visionary by not also evaluating possible futures that involve a higher funding level – illustrating the additional benefits to the region that might be achieved through high levels of funding (whether from state, Federal, local, and/or private sources). Conversely, some assessment of a “worst-case” scenario (e.g., if the Federal government does not find a source to make up for continuing Highway Trust Fund declines) could also inform the regional planning process. Finally, different allocations of a fixed funding scenario might be considered to evaluate the range of impacts. We strongly encourage the MPO to undertake a scenario planning exercise prior to the next LRTP that includes consideration of different funding futures and illustration of their benefits.
 - Given the increasing focus on “smaller” projects such as Complete Streets, intersections, etc. that cannot be easily evaluated in the regional model, we suggest that the MPO consider alternative evaluation methods, or enhancements to the regional model, that can better evaluate the impacts of the full range of MPO investments. The MPO’s tools should be able to consider hypothetical mixes of these projects even before specific projects are selected for programming.
- We suggest that scenario planning to support the next round of LRTP development should consider the full range of regional project and funding sources – not just the incremental changes in discretionary MPO funding. This should include coordination with the Commonwealth to help measure the collective benefits of MassDOT and MBTA-funded projects and jointly work to set funding priorities. This kind of early coordination amongst these agencies on the LRTP would support a more integrated approach to developing transportation projects and programs that support regional goals and objectives.
- We appreciate the ongoing challenge to engage stakeholders and the public in long-range planning, and the MPO’s efforts to engage all types of communities. We encourage the MPO to continue to look at better ways to make connections into communities and obtain input, such as building relationships with town transportation committees and encouraging towns to build local capacity and gather input through these committees.

The Advisory Council greatly appreciates your consideration of these comments.

Sincerely,

Tegin Teich
Chair, Regional Transportation Advisory Council
tteich@cambridgema.gov, 617-349-4615