

ALL WRITTEN PUBLIC COMMENTS RECEIVED

RE: federal fiscal years (FFYs) 2021–2025 Transportation Improvement Program (TIP) Public Review Period (Alphabetical by Project Municipality, Chronological by Date Received)

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RE: Project #609204 - "Belmont Community Path" problems.

Dear Sir,

I wrote to you on 9/11/2019 concerning the flooding problems on Channing Road. I attended the zoom meeting led by Nitsch. They discussed channeling all the drainage runoff from the RR berm into the Channing Rd Storm drain system. This is totally unacceptable. Channing Rd gets almost of the drainage from Belmont hill (Claflin St, prospect st and upper concord ave). For many years, the manhole covers would spout water and blow off out of the pavement do to the pressure for the water streaming down Belmont hill. This would happen on Pleasant and Cross st. It was so bad, the town had to add storage holding tanks to Channing from Sherman st to the brighten st. Even now, this system does not function correctly. The storm rain in front of 125 Channing and the intersection at Alexander ave and Sherman flooded during the storm that occurred on Friday night 5/15/2020. Also, my back yard flooded. Also, Nitsch talked about a 20 foot path. I feel the narrower the path the better as to allow for better drainage. A 10 or 8 foot path would provide better drainage. I also free that all the drainage from the berm should be channeled south towards of the tracks toward ClayPit pond and the natural stream that flows out of it towards Cambridge.

Concerning a pedestrian tunnel. A 40 foot tunnel (10 ft north of the tracks, 20 ft for the tracks, 10 south of the tunnel) would provide more adequate safety for the students. No one needs a superhighway with swooping entrances on and off. The entrances for the bikepath should be at the roadway tunnel level. There should be no overhead path above the tunnel. Keep it simple. Slow the traffic down and keep every one save. Please place it as far away from our property as possible. We would like to keep some privacy.

Thank you,
Paul Cobuzzi

Submitted via email 5/21/20

Re: Public Comment Belmont Community Path - Project #609204

Dear Mr. Genova,

Thank you for your time on the phone yesterday allowing me to voice my husband's and my concerns about the proposed project.

The town of Belmont has been attempting to impose a linear park on the Channing Road neighborhood for decades against the wishes of many of us that about the land to be used. The town has gone out of its way to exclude us during the planning phases and has refused to listen to our legitimate concerns. When alternatives have been proposed (PARE feasibility study) that would have had far less impact on our neighborhood they were dismissed by the town. (As a matter of fact, a CPPC member and town Selectman remarked that PARE should have never come up with alternatives and should just have considered only the BCF land route.)

The resulting proposed project - Belmont Community Path - as approved by the town is an elevated linear park sited on MBTA property and BCF (Belmont Citizens Forum) land adjacent to and overlooking the rear yards of the Channing Road homes. The BCF land - approximately 30' wide - is primarily the steep embankment of the rail line that starts at abutters' property line and rises about 10 -12' in back of our home.

To build such a park, the town's plan has been to remove the existing embankment tree line, encroach on our properties to build a retaining wall to turn the embankment into level land, cap the retaining wall with a 10-15' wall, and landscape the park side with a soldierly line of arborvitae that grow an average of 40'. This proposal would mean encroachment and damage to all or many of the ~70 homes lining Channing Rd.: our fences, mature trees, cedar sheds, gardens, and lawns. The town's plan would have left us deprived of southern sunlight during the winter because of the height of the walls and line of evergreens. It would turn our backyards into canyons with a south-facing, featureless wall about 25-30' high and that would greatly diminish the enjoyment of our homes. If we refused the wall then we would be exposed to the prying eyes of people in the overlooking park, violating our privacy.

This abutting park also represents many other problems:

1. easements that will take land away from some abutters
2. reduced quality of life for us due to noise, park lights and the loss of wildlife
3. drainage and sewer issues due to the park's 16' wide asphalt strip
4. safety concerns due to proximity to the commuter rail and the soon to be installed 7 x 1000 lb. propane tanks at various points along the RR, including at the proposed site of the Alexander St. underpass.
5. winter salt damage to our trees and gardens (the town proposes year-round 24/7 use)
6. an increase in local crime (planners refer to parks as "crime generators")
7. littering
8. decreased property value

9. increased traffic and parking problems at park access points

Unlike the town, MassDOT Project Manager Michael Trepanier has listened to our concerns and that of other neighbors. He and the MBTA have taken steps to alleviate to a degree some of these problems such as:

1. privacy and noise: moving the park farther from our homes
2. drainage/sewer: reducing the width of the asphalt strip and installing a drainage pipe
3. encroachment: no retaining wall

However, some of the problems are alleviated but not eliminated. Many problems remain, having to do with considering this a park rather than a bike path as well as proximity to abutters' properties and the town's antiquated sewer system. This unhappy situation would be easily solved if the town was willing to consider the alternate routes presented in the PARE feasibility study or were more willing to collaborate and not stonewall the abutters.

Sincerely,

Maria A. Leza, Ph.D.
Darin K. Takemoto, Ph.D.
91 Channing Road
Belmont, MA 02478

H: 617-489-2952

Submitted via email 5/21/20

Re: Belmont community path

Hi, Mr. Genova,

This is Annie Xie. I live in Channing Rd. Belmont. I heard that MPO is willing to listen to us. Thank you!

This email is about the community path in Belmont. The CPPC is pushing to get approved. They don't share information to us. Each time, I ask them questions. They would say information not available and they would share before sign-off. They don't do what they said. It takes months for them to publish the meeting minutes. I don't understand why the abetter has no voice in the process.

There are a lot of issues which needs to be resolved, including privacy, safety, drainage, lighting, etc.

I hope CPPC would address our abutters' concerns and share more information with us.

Thanks,
Annie Xie

Submitted via email 5/21/20

Re: Proposed Bike path in Belmont

Dear Mr. Genova,

My name is Margaret (Merrie) Watters and I live at 105 Channing Rd. which abuts the proposed bike path in Belmont. To save us both time let me echo the many concerns about the location of this path which were well outlined by my neighbor, Cindy Taylor. She has been an excellent leader in our neighborhood of Precinct 8.

Cindy, also an abutter, is someone that I admire and appreciate very much.

This has been my family's home since 1965. Many of my neighbors and I have been opposed to this path location on the north side of active MBTA for over 23 years, dragging our selves out to town meetings about this issue which are poorly facilitated by local officials and often packed with non residents of Belmont to push their agenda for this path location. Despite several letters to the selectmen, they have never responded to my concerns. This notion they like to refer to now as a "community path," is fraught with serious problems and has been an enormous intrusion into my life. Since we moved here in 1965 I believe there have been about 10 people killed on those tracks, including children. Over these many years there has been little or no monitoring of safety along the tracks.

Please understand that I am not opposed to a public path, just the current proposed location. I am a retired O.R. nurse and I taught safety courses for many years, so I'm in full support of safety for bicyclists, and I believe the path should be located on the south side of the MBTA tracks, if not somewhere else altogether.

I would appreciate any effort you can make to support a safer option than the current one. Thank you.

Very truly yours,
Margaret Merrie Watters

Submitted via email 5/21/20

Re: Belmont Linear Path

Good Afternoon Mr. Genova,

My name is Jen and I am an abutter on Channing Rd in Belmont. This community path proposed is actually a linear path where people can congregate and stay as there were proposed benches and even a water fountain at one point. Having thousands of people behind my home at any given time is extremely nerve wracking and adds a lot of anxiety as I have young children who frequently play in our backyard. There is minimal space between the tracks and my yard. Over the years there have been an immense amount of concerns raised regarding this path including: the water drainage (many homes have water issues and this would add to the water run off issues right into our property), the added noise, the security threat of people being behind your home and not being monitored, the added pollution and lights, the loss off wildlife who call the land behind our home their refuge and safe place to live, as well as the loss of beautiful trees and most importantly the loss of privacy. There have been many studies that show on community and bike paths there is an increase in crime due to the amount of people using the area and it not being visible, especially at night. I also worry about the increase in potential poison being drained right into my backyard and thus my garden vegetables through the soil with the increased use of salt in the winter in order to maintain snow/ice removal. On top of all these issues the area proposed behind our homes is raised well above our property level. If someone walks next to the train tracks right now they can see into our yard as if they were standing over it. It is not a frequented area for exercise or recreation as the train is there and frequently comes by.

There had been an independent company hired who completed a thorough investigation into the best route for this potential path and it was not deemed to be the land directly behind our homes. This unbiased company proposed the other side of the train tracks where the abutter is the Belmont high school and not an entire neighborhood of families who have opposed this for years and for many good reasons. There were also other alternative routes for this path that could have solved the issues that our entire neighborhood is facing if this path is placed basically in our backyards and I would appreciate consideration given to those routes. This path is supposed to be for the entire community however, an entire community is upset by the placement of the path and I think that is something that should be taken into account with this decision. I do believe that this path being behind our homes will also devalue our properties, which is unfair. It is upsetting to think that with many other alternate routes my home and back yard may never be the same and so many in my neighborhood have to worry about the numerous and extremely serious issues mentioned in this email. Living with this potential path 24-7 basically in our backyards is honestly too much to ask of people who do not oppose a path in town, just a path right behind their homes. Please consider alternate routes and help our neighborhood.

Thank you so much for taking the time to read this and I appreciate your consideration in this matter.

Sincerely,

Jen

Submitted via email 5/21/20

Re: Belmont Path Comments

Dear Mr. Genova,

There is no doubt that a bike path through Belmont would promote exercise, reduce traffic congestion, and provide the necessary connection to a network of trails from Boston to Berlin.

Pare's recommended route option, which at the time had approval by the Board of Selectmen, and the majority of the Community Path Committee, was quickly dismissed, revoted on by a newly appointed path committee and changed to reflect the desire of a certain official at the state level. His efforts focus on a north side only option, dismissing information that supports safe and significantly less expensive alternatives, and the only route option he positioned to the MBTA, which has been supported financially, declining support for any alternatives.

The Cambridge Quadrangle Project, something Belmont's Path could dovetail into seamlessly providing additional path connections, was deemed unrealistic by the Senator and members of Belmont's governing body. With plans, excavating, bridges, and new path connections, it's a shame that it's being overlooked.

The public was led to believe that part of a building would have to be "demolished" in order for the path to be located on the south side of the tracks near Brighton Street. But, neglected to disclose that the difference is mere inches when considering the north and south side route options, and unlike the north side no changes or restrictions to any business would be affected.

Most in our community are well aware of the numerous accidents at Hills Crossing. Has anyone looked at the data collected, including the video showing the traffic congestion and vehicles getting stuck on the tracks because they can't move? Has this information been shared between federal, state, and local officials involved in making these important decisions?

I hope that personal agendas and pressure at the state level is not influencing these decisions, just to satisfy a politician, along with a small population of individuals. Please consider safety and cost over politics.

Thank you for your time,
Cindy Taylor

Submitted via email 5/21/20

Jessica L. Whited
710 Pleasant St.
Belmont, MA 02478
617-694-6312
jessicalamae@gmail.com

May 20, 2020

Mr. Matt Genova
mgenova@ctps.org

Dear Mr. Genova,

I am writing with respect to the Belmont Community Path that is being considered for construction. As a homeowner and direct abutter of the proposed northern route, I have serious concerns about the creation of this path. I am reaching out to you because I have had a difficult time getting answers from the people who are planning the path. I hope you can help answer my questions and perhaps serve as an advocate for those of us that are concerned about the progression of the project.

While I am a relatively new resident of Belmont having lived here now just two years, I am aware that the bike path planning has caused considerable concern in the town. I am also aware that not all homeowners feel their voices have been heard on this issue. I did attempt to discuss it at a recent committee meeting open to the public, but there was little will on the part of the organizers to bring a new resident—and abutter—up to speed on the issues. The city's online information site is woefully lacking in important information. As a single mom, full-time professor and scientific researcher, I do not have a lot of free time, and I have found myself increasingly spending it trying to get to the bottom of this bike path plan.

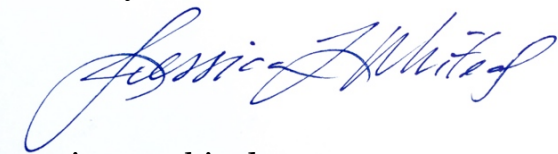
My house, which I bought last summer (2019), directly abuts the north side of the commuter rail tracks. The path will cut through mature shade trees situated in my backyard. I do not intend to allow the state, town, or MBTA to clear or otherwise harm any of the shade trees within my private property, as defined by those whose trunks meet the ground within my property boundary. There are several very mature maple trees that are especially vulnerable to disruptions that will be created during construction. I will be hiring both a surveyor and an arborist to map and measure the specific trees. The independent arborist will also advise me on what radius of undisturbed ground soil that will be required to ensure that these trees within my private property are not left vulnerable to disease and malnutrition as a result of the project. My concerns about the health of mature shade trees over six inches is covered within MA general state law, Part 1, Title XIV, Chapter 87, Section 11. This law reads: "Whoever wilfully, maliciously or wantonly cuts, destroys or injures a tree, shrub or growth which is not his own, standing for any useful purpose, shall be punished by imprisonment for not more than six months or by a fine of not more than five hundred dollars." I am also concerned about the water drainage in that area as it slopes to a low-lying, vegetated area prone to accumulating standing water after rains. After heavy rain,

there are two pools of standing water that form and can take a substantial time to disperse. These form in my yard at the base of the slope on which they propose to build the path. Because I have not felt heard in this process and I have spoken with other neighbors who feel the same, I have contacted an attorney. I will retain him to represent me should it be required to ensure my rights as a homeowner are respected if this project continues as planned. I would much rather the problems not be solved by litigation, but for that to happen, it seems some fair individuals who are also effective communicators must take charge of the project.

Considering so many homeowners on the north side of the tracks object to the path being constructed on the north side, I urge the state to again look at other options. There is an obvious solution to this issue, which would be to situate the path south of MBTA tracks. For those of us on Pleasant Street, this would eliminate the concern about the health of our private trees, and it also makes more sense because the path would be cutting through an empty wooded area owned by the MBTA and Town of Belmont instead. It may also make more sense with respect to Channing St. The south side is more logical as a means of accessing the path if we are imagining high school students will be using it. However, regardless of which side of the tracks the path is constructed, I am also deeply concerned about the safety, especially for children and teenagers who are expected to frequent it. Pedestrians and cyclists in close proximity to live train tracks is a recipe for disaster, and I hope that the planners have imagined the scenarios that could unfold should this project be executed. I am also concerned about privacy and crime as a result of this project as planned, and as a homeowner abutter, many of these issues will directly impact on my property value.

In summary, I implore you to investigate the feelings of the Belmont residents with the most at stake in this project rather than just the overall public. We are the ones that will have to live with the consequences of this path on a daily basis on our properties. We should not be expected to incur any personal losses in exchange for a public works project that we do not, in fact, support. It is not apparent why the southern route has been abandoned. If this decision is solely attributable to costs, I think the state should revisit this conclusion prior to final planning and execution. Much of the southern route is held by public groups, and so the burden of its destruction to create a path is shared by all in the community. This makes more sense than asking several dozen Belmont homeowners to shoulder the entire burden. Thank you for taking the time to read my letter, and I hope to hear from you soon. You can contact me by email, phone, or regular mail.

Sincerely,



Jessica L. Whited

Re: Belmont Path

I would like to invite you to Belmont and take a look for yourself. I think the same things can be accomplished for a lot less money. Happy to meet over coffee. Thx Frank. I am an a butter.

Frank French

Submitted via email 5/20/20

Re: Belmont Community Path

Dear Mr. Genova,

I was told today there is a comment period on the proposed Community Path in Belmont. I am hoping you are the correct person to send my comments, if not could you let me know who the proper person is. I am a Channing Road abutter to the proposed path and was a member of the first of three town committees on the path. I could go on for hours on the problems with the proposed path and the improper and unethical means by which the route of the path was chosen, but will highlight a few of the more significant issues with the proposed route.

First is the fiscal irresponsibility, which during the current economic period we are in, due to the Coronavirus, is even more offensive if not mismanagement of funds.. The selection of the path route was narrowed down to two alternatives, the north and the south sides of the rail line. The path on the North side is estimated to cost \$3.9 million dollars more than the south side by the consulting firm (Pare Corp.) hired by the town. In fact the report generated by Pare recommended the route on the south side of the rail. The, MBTA property would not even be impacted by this route. In addition, the route on the south side would be even cheaper now that the town high school is being rebuilt. The new design for the high school includes three multi-use paths, including one along Concord Ave that was one of the alternatives proposed in the reports and favored by abutters. Thus the path could easily be adjusted to utilize this route. If that were not enough, the design consultant for the high school stated they could incorporate the proposed South Side path in their construction along the back of the high school. Since they will have already mobilized construction equipment to pave the adjacent there would be considerable cost savings beyond the \$3.9 million dollars saved by placing the path here. For reasons I will state in a few minutes, I will be sending these facts to the state attorney general as well. There was also a public meeting on these proposals in which I highlighted the cost savings, and the reply by **Selectman Adam Dash was that the State is paying for construction costs and if it costs more its the State's concern not ours.**

There are several issues which make the Southern route a safer alternative, but one of the big issues is access to the path by emergency vehicles. The Fire Chief has stated in the past that he needs at least a twelve foot width for his emergency vehicles which is simply not possible for the entire route on the North Side. The proposed path would also create a 0.75 mile stretch of isolated path with only one access point. I would definitely say this is not somewhere I would want a child to travel alone. Predators love isolated areas like this. A path on the South side would be more open, accessible, lighted and easily patrolled by the police. There is a project currently being developed on the east side of the path in Cambridge which would allow for a safer path crossing of the rail line which is also being ignored by the town.

As an abutter I have a huge concern over the fact that the town now wants to provide lighting on the path. The town has broken its promises from the original committee report, which stated the path would only be used from dawn to dusk. Abutters have bedrooms along the north side of the rail. Allowing people to use the path at night will disrupt our sleep and lead to health problems. This cannot be allowed, and will lead to legal actions. I also believe there is a Fifth Amendment Issue over the peaceful enjoyment of my property, due to the fact that this proposed path is elevated about 12 feet above the rear of my property.

The town path committee (in particular committee member Vince Stanton) has also misled the public over the issue of hazardous contaminants on the proposed North Side Route. He stated analytical data east and west of the current segment saying that the contaminants should be similar. Nothing could be further from the truth. The areas east and west of this segment are ground level whereas this segment is elevated with fill material from decades ago. As per MASS DEP guidance "Best Management Practices for Controlling Exposure to Soil during the Development of Rail Trails", " Absent analytical evidence to the contrary, all soil along the right-of-way should be presumed to have at least residual levels of lead, arsenic, and PAHs...." This is even more likely since the material is fill. This is no more evident than the recent PCB contamination found near the Natick Portion of the Cochituate Rail Trail. This will likely add millions of dollars and years to to construction. At, a minimum the 12 feet of fill in this segment will result

in hundreds of thousands of dollars in analytical costs to comply with the National Environmental Policy Act, MEPA and 21E laws. Also, potential contamination is not just an issue during construction, it is a permanent issue, because of poor drainage in the area the design will include subsurface drainage which must be maintained. All this is unnecessary on the South Side.

Lastly, I want to address the ethical issues which appear to have led to the selection of the more costly, less safe, and more disruptive route. The board of Selectman chose, per the recommendation of Pare Corporation the route on the South Side. Subsequently, State Senator Will Brownsberger publicly admonished the town for not selecting the path on the North Side and asked them to reconsider. The Selectman revisited the issue and changed the route of the path. One of the main concerns stated by the selectman was the access to funds through the state if the path was placed on the South Side. Mr. Brownsberger is an avid local cyclist and friend to the Belmont Citizen Forum. The Belmont Citizens Forum purchased a strip of land along the North Side of the Rail which it wishes to sell to the Town for the North Side Path. Vince Stanton, a member of the of all three of the Town Committees for the Community Path is also an officer of the Belmont Citizens Forum.

Regardless of any improper behavior by Town and State officials, the Town has not shown any good faith with the abutters frequently ignoring their concerns for noise, light, and trespassing, hours of use, and safety. Their current plan is to propose such an offensive barrier between the path and the abutters that we will give in on a sound and sight barrier, and if they do agree to a proper barrier I'm sure they will run out of money before its in place and open the path anyway. If they agreed to have only a dawn to dusk path, once it is built I would bet any money they will change their mind again. I hate to sound cynical but I have been dealing with this issue for years in good faith and speak from experience. I honestly believe the only solution is to change the path to a cheaper and safer path on the South Side. As indicated earlier by Town Selectman Dash the additional \$3.9 million dollars is the State's concern. I hope you find this concerning.

Cosmo Caterino

Submitted via email 5/20/20

Re: 608522 Middleton Bridge Replacement M-20-003 Maple Street over Ipswich River

Andrew Sheehan (andrew.sheehan@middletonma.gov) sent a message using the contact form at <https://www.ctps.org/contact>.

Lane restrictions (Jersey barriers) on the subject bridge were initially installed on October 1, 2015. The condition of the bridge continues to deteriorate while posing hazards to both the environment and travelling public. It is imperative that this project not be further delayed and increase the risk to motorists and the Ipswich River.

ZIP code: 01949

Re: Maple Street Bridge Replacement

Katrina O'Leary (katrina.oleary@middletonma.gov) sent a message using the contact form at <https://www.ctps.org/contact>.

As the Middleton Town Planner I would like to offer my strong support of project #608522 for the bridge replacement on Rte. 62 (Maple Street) over the Ipswich River. This project includes a pedestrian bridge that is a very important part of completing a Rail Trail in Middleton that connects with the one the Town of Danvers is planning. This project was delayed in the past and I hope it continues through without any more holds. Thank you.

ZIP code: 01949

Re: Bike/Trail Connection

Robert Spiegelman (robertspiegelman@comcast.net) sent a message using the contact form at <https://www.ctps.org/contact>.

FFY24: Project # 609211 – Independence Greenway Extension Project

FFY25: Project # 610544 – Multi-Use Path Construction of Independence Greenway at I-95 & Route 1

These projects are critically important for transportation, safety, and recreation. It is great that there are existing greenways but until they are connected the benefits and the usage are drastically reduced. Please fund and complete them as soon as possible. Thank you.

ZIP code: 03301

Submitted 5/23/20

Re: Support for FFY25: Project # 610544 - Essex Heritage

Anya Wilczynski (anyaw@essexheritage.org) sent a message using the contact form at <https://www.ctps.org/contact>.

On behalf of the Essex National Heritage Commission (Essex Heritage), I am writing in support of FFY25: Project # 610544 – Multi-Use Path Construction of Independence Greenway at I-95 & Route 1. Essex Heritage’s mission is to preserve and promote the historic, cultural and natural resources of Essex County; one of those key natural resources is the abundance of trails throughout the county. Essex Heritage has been an advocate for the regional greenway trail network, including the Independence Greenway and is pleased to see the continued investment in this valuable project. The Independence Greenway is a key project within the Essex County Trail system and the extension would continue to provide residents with a multitude of benefits that a local trail brings. I strongly encourage that this project receive federal funding through TIP.

ZIP code: 01970

Re: Support for FFY24: Project # 609211 - Essex Heritage

Anya Wilczynski (anyaw@essexheritage.org) sent a message using the contact form at <https://www.ctps.org/contact>.

On behalf of the Essex National Heritage Commission (Essex Heritage), I am writing in support of FFY24: Project # 609211 – Independence Greenway Extension Project. Essex Heritage’s mission is to preserve and promote the historic, cultural and natural resources of Essex County; one of those key natural resources is the abundance of trails throughout the county. Essex Heritage has been an advocate for the regional greenway trail network, including the Independence Greenway and is pleased to see the continued investment in this valuable project. The Independence Greenway is a key project within the Essex County Trail system and the extension would continue to provide residents with a multitude of benefits that a local trail brings. I strongly encourage that this project receive federal funding through TIP.

ZIP code: 01970

Re: Connecting 3 trails in Peabody

David C Read (dave@readfamilyhome.com) sent a message using the contact form at <https://www.ctps.org/contact>.

FFY25: Project # 610544 – Multi-Use Path Construction of Independence Greenway at I-95 & Route 1

Hi, the regional significance of this project cannot be overstated. This project will allow the connections of 3 different trails. Currently, to get between trails, one has to cycle on Lowell Street which is always busy with car traffic. Two of these three trails are part of the East Coast Greenway project which is increasing in popularity and bring more people to the businesses of Peabody.

We hope you will consider funding this project for construction in 2025.

Thanks,
The Read Family

ZIP code: 01983

Re: Peabody - Independence Greenway Extension

David Read (dave@readfamilyhome.com) sent a message using the contact form at <https://www.ctps.org/contact>.

FFY24: Project # 609211 – Independence Greenway Extension Project

Hi, we are writing in favor of extending the Independence Greenway in Peabody. This trail is an an important component of the Border to Boston Trail that us also part of the north-south national trail, the East Coast Greenway. We hope you will consider funding it to ensure it's built in 2024.

Thanks!
The Read Family

ZIP code: 01983

Re: Support for FFY24 Project #609211 and FFY25 # 610544

Herb Nolan (Herbnolan@solomonfoundation.org) sent a message using the contact form at <https://www.ctps.org/contact>.

On behalf of the Solomon Foundation, I am writing to express our support for Project # 609211 – Independence Greenway Extension Project and Project # 610544 – Multi-Use Path Construction of Independence Greenway at I-95 & Route 1

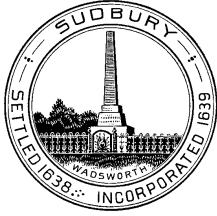
Both are important projects for the City of Peabody and Region that will further the development of the Northshore's greenway network well as connect with Essex County and the State's regional bikeway network. Development of these bikeway segments will increase the Independence Greenway from 6 miles to approximately 10 miles and continue to connect segments of the national East Coast Greenway as well as provide the critical link for the Border to Boston trail by constructing a new bridge over Route 1.

Project #610544. This project is the critical link connecting the two Independence Greenway segments, as well as connect with Peabody's bikeway spur trail connection to the Danvers Rail Trail. This project is highlighted by the construction of a new two-span bridge over Route 1 Northbound and Southbound lanes. The construction of this bridge will provide a significant safe and comfortable connection in the region's greenway trail network and an active transportation route for Essex County, and link communities from Salisbury to Boston. Since the trail will be visible from Route 1, this bridge will also serve as a billboard and invitation to the trail to new trail users.

Peabody has shown incredible leadership providing city residents as well as the North Shore community with greenway amenities, building out their bike network which enhances the region's quality of life, and provides great transportation, health, climate, and economic benefits. The Independence Greenway is a major community asset for the City of Peabody, Essex County, and the entire region. It is the most utilized recreational resource in Peabody and all types of trail users have access to it. Peabody is a heavily populated Gateway City and the Independence Greenway provides an opportunity for trail users to get off the congested roadways, experience the City's natural resources, and take advantage of the safe, healthy transportation and passive recreation the Independence Greenway offers.

Sincerely,
Herb Nolan
Executive Director
Lawrence and Lillian Solomon Foundation

ZIP code: 02481



TOWN OF SUDBURY

Office of the Town Manager

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Henry L. Hayes, Jr.
Town Manager

April 29, 2020

Secretary Stephanie Pollack
Attn: Mr. Matt Genova, TIP Manager
Boston Region Metropolitan Planning Organization
State Transportation Building
10 Park Plaza, Suite 2150
Boston, MA 02116

RE: Bruce Freeman Rail Trail Project in Sudbury (608164) for the FY 2022 TIP

Dear Chair Pollack and Members of the Boston Region Metropolitan Planning Organization,

As the new Town Manager for the Town of Sudbury, I thank you for your ongoing support of the Bruce Freeman Rail Trail (BFRT), Phase 2D project (MassDOT Project 608164) and for proposing the project remain in the FY 2022 TIP. The Town has worked for years to advance the design of the BFRT project and is currently in close coordination with MassDOT to address comments received on the 25% design submission and is poised to advance the 75/100% designs. We hope MassDOT may be able to schedule a Design Public Hearing very soon and utilize a virtual meeting platform, if necessary, to help keep us on track to deliver the project design on schedule.

The Town of Sudbury recognizes the considerable financial constraints on the MPO during this FY 2021-2025 TIP programming cycle and appreciates your support to keep the BFRT scheduled in FY 2022. This significant project of statewide and regional importance will advance and build on the previous sections of the BFRT, now serving the communities along the corridor and the region in a meaningful way during this crisis.

The Town has been and remains committed to this important priority regional project.

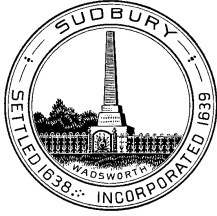
Thank you for the dedication of the members and the staff of the MPO to maintain the public process on the original schedule during the pandemic. This robust virtual engagement process has advanced smoothly and provided a model for other public forums.

Please do not hesitate to contact me at hayesh@sudbury.ma.us or 978-639-3381 or Beth Suedmeyer in our Planning and Community Development Department at suedmeyerb@sudbury.ma.us or 978-639-3363, if you have any questions or seek additional information.

Respectfully submitted,

Henry L. Hayes, Jr.
Town Manager

cc: Sudbury Select Board
Senator Jamie Eldridge
Senator Michael Barrett
Representative Carmine Gentile
David Mohler, MassDOT OTP, Director
Barry Lorion, District 3, District Highway Director



TOWN OF SUDBURY

Office of the Town Manager

www.sudbury.ma.us

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978-639-3381

Fax: 978-443-0756

Email: townmanager@sudbury.ma.us

Henry L. Hayes, Jr.
Town Manager

May 19, 2020

Secretary Stephanie Pollack
Attn: Mr. Matt Genova, TIP Manager
Boston Region Metropolitan Planning Organization
State Transportation Building
10 Park Plaza, Suite 2150
Boston, MA 02116

RE: Bruce Freeman Rail Trail Project in Sudbury (608164) and the FFY 2021-2025 TIP

Dear Chair Pollack and Members of the Boston Region Metropolitan Planning Organization,

The Town of Sudbury is pleased to offer a letter of support for the draft 2021-2025 TIP and express our appreciation for the Board's continued commitment to programming the critical Bruce Freeman Rail Trail (BFRT) Project, Phase 2D (608164) in FFY 2022. The Town has worked for years to advance the design of the BFRT project and is currently in close coordination with MassDOT to address comments received on the 25% design submission and is poised to advance the 75/100% designs.

With the Phase 2B, the bridge over Route 2 advancing to construction, this year, nearly 15 contiguous miles of the BFRT north of Sudbury will be completed. Sudbury is excited for the construction of our 4.4 miles section of the Trail to advance and extend the regional trail, improve pedestrian facilities, provide bicycle accommodation, and offer healthy transportation options.

The Town, through Town Meetings with broad voter support, has allocated more than one million dollars to the design of the project -- a direct indication of the will of the people regarding this project. The Board of Selectmen and staff are committed to delivering the project design on schedule to advance this priority regional project to construction.

We hope MassDOT will approve our design and schedule a Design Public Hearing very soon. We are pleased to hear that MassDOT has adopted a protocol to use a virtual meeting platform for Design Public Hearings during the Covid-19 pandemic response, and we hope a meeting will be scheduled soon to help keep us on track to deliver the project design on schedule.

Please do not hesitate to contact me at hayesh@sudbury.ma.us or 978-639-3381 or Beth Suedmeyer in our Planning and Community Development Department at suedmeyerb@sudbury.ma.us or 978-639-3363, if you have any questions or desire to seek additional information.

Respectfully submitted,

Henry L. Hayes, Jr.
Town Manager

cc: Sudbury Select Board
Senator Jamie Eldridge
Senator Michael Barrett
Representative Carmine Gentile
David Mohler, MassDOT OTP, Director
Barry Lorion, District 3, District Highway Director



TOWN OF WATERTOWN

DEPARTMENT OF PUBLIC WORKS
124 ORCHARD STREET
WATERTOWN MA 02472

(P) 617-972-6420
(F) 617-972-6402

Gerald S. Mee Jr.
Superintendent

May 26, 2020

Mr. Matt Genova
TIP Manager
Central Transportation Planning Staff
10 Park Plaza, Suite 2150
Boston, MA 02116

RE: Watertown – Rehabilitation of Mount Auburn Street
MassDOT Project File Number 607777

Dear Mr. Genova:

On behalf of the Town of Watertown, I would like to express our support for the Rehabilitation of Mount Auburn Street (MassDOT Project File #607777). Mount Auburn Street, signed Route 16, is a major corridor in the Town, connecting Watertown Square and the East End of Watertown with Cambridge. The Perkins School for the Blind, Watertown High School, Hosmer Elementary School, and Coolidge Square Business District are served by Mount Auburn Street, in addition to major business institutions and residential areas. The Route 71 trackless trolley, which traverses Mount Auburn Street, has been identified as a Key Bus Route, with transit ridership ranked in the top 15 of the entire system.

There are a number of safety issues with the current road layout. The Coolidge Square segment of the corridor has been identified as a High Crash Location by MassDOT. Many sidewalks and handicapped ramps do not meet current ADA standards and have poor visibility. There are no bicycle accommodations.

The Town has adopted a Complete Streets approach to the design, attempting to balance the needs of all users in the corridor. The proposed project will transform the Mount Auburn Street corridor from its existing configuration as a four-lane arterial roadway designed solely to process through traffic into a bicycle- and pedestrian-friendly street serving the community, consistent with the goals of the Town's 2015 Comprehensive Plan and 2017 Complete Streets Policy. Reducing the roadway cross section from four vehicular travel lanes to two vehicular lanes, where feasible, will allow for the inclusion of bicycle lanes and wider sidewalks. Additional pedestrian safety improvements include curb extensions at crosswalks to reduce crosswalk lengths and increase pedestrian visibility. The project seeks to improve transit reliability through the use of transit signal priority and/or bus queue lanes, where appropriate.

Over the past year, the Town has been in continuous contact with its partners, including MassDOT, MBTA, DCR, and City of Cambridge. During the 2019-2020 period, the Town has taken a number of steps to continue advancing the project, as noted below:

- The Town submitted 25% design plans to MassDOT in December, 2019. As has been discussed with the MPO, the 25% design included an updated cost estimate that reflects the changes to the design that have occurred to better incorporate complete streets concepts as well as substantial increases in bid prices that have been experienced regionally over the past few years.
- We met with representatives of MassDOT and MBTA to have preliminary discussions regarding needs for public and private utility upgrades, the potential for upgrades to the MBTA catenary wire system and phasing of the project.
- We are currently reviewing MassDOT comments in anticipation of holding a Design Public Hearing later this year and development of 75% design plans.
- The Town continues to maintain a project web site, found at www.mountauburnstreet.com. The site contains background information about the project, meeting information, as well as project plans and documents.

The draft 2021 – 2025 TIP has spread the project cost over FY'22 and FY'23. We appreciate continuing to be scheduled for FY'22 TIP funding, and intend to take the necessary steps to remain on this schedule.

The Town wishes to thank CTPS and the MPO for their consideration for this important project for the Town and the Boston metropolitan region. It contains a number of elements of key importance to the TIP program, including significant safety improvements for all users, improvements to the pedestrian and bicycle network as well as transit assets, reductions in congestion and delays for vehicles and transit, as well as air quality and stormwater management improvements.

Please feel free to contact me at the number listed above if you have any questions or concerns regarding our project.

Sincerely,



Matthew I. Shuman, P.E.
Town Engineer

Cc: Michael J. Driscoll, Town Manager
Gerald S. Mee, Jr., DPW Superintendent
Steven Magoon, DCDP Director
Richard Benevento, WorldTech Engineering



The Commonwealth of Massachusetts
House of Representatives
State House, Boston Room 540

RICHARD M. HAGGERTY
STATE REPRESENTATIVE
WOBURN-READING

May 21, 2020

Dear Chair Pollack and MPO Representatives:

We write to today to offer our strong support for the construction of the New Boston Street Bridge in Woburn.

The construction of the New Boston Street Bridge offers three direct benefits to the City of Woburn and the Commonwealth including increased regional economic growth, traffic congestion remediation, and expanded access to Anderson Regional Transportation Center.

As way of background, the Commonwealth has invested heavily in the Commerce Way area of Woburn for over two decades. First by constructing Commerce and Presidential Ways, literally paving the way for hundreds of thousands of commercial real estate space and nearly one thousand units of housing. Secondly by constructing Exit 37C and providing direct access to that area off of Route 93. Thirdly the Commonwealth constructed Anderson Regional Transportation Center, one of the busiest transportation hubs in Massachusetts.

The Commerce Way area is home to such major employers as Raytheon, Cumming Properties, American Tower, and Randstad – all possible because of the sound planning partnership between Woburn and the Commonwealth.

Now we look to expand upon our shared success. We believe we can emulate that same economic growth along the parallel roadway, New Boston Street, with the construction of the New Boston Street Bridge. The regional economic benefit is expected to be substantial and landowners along New Boston Street are already planning for future development opportunities including housing, mixed-use developments and life science company expansion.

Today pedestrians, cars and trucks on New Boston Street must travel nearly three miles to access Anderson Transportation Center or Route 93. The construction of the bridge will cut that distance by two-thirds and reroute traffic off of congested roadways in Woburn, Reading and Wilmington.

Anderson Station is currently accessible from only one side of the tracks and the proposed bridge will provide improved access to the regional transportation center for vehicles as well as pedestrians. It is easy to envision a day when many of the homeowners in neighborhoods off of New Boston Street will be able to walk to the train station to go to points north and south.

We also write today to offer our strong support for the reconstruction of the intersection in Woburn/Burlington at Route 3 (Cambridge Road) and Bedford Road and South Bedford Streets. Indeed, this intersection is a “high-crash location” as determined by the MassDOT Road Safety Audit performed in 2014. The proposed improvements will go a long way toward modifying one of the most dangerous intersections in our community.

While this convergence of roadways has been an unsafe situation for many years, the recent economic expansion in Burlington has worsened its functionality. The intersection improvements will allow for the widening of the roadway and provide dedicated turning lanes for vehicles. It will also allow for continued economic development in the area, which will be critical as the Commonwealth grapples with the fallout from the COVID-19 crisis. Most importantly, this will create safer travel lanes and more cohesive pedestrian access.

We also wish to express our support for the Woburn Center intersection improvements. The proposed changes included in this essential Complete Streets project offer several safety enhancements to a series of intersections at Woburn Common including Winn Street, Pleasant Street, and Montvale Avenue. Downtown Woburn continues to be a center of economic activity; however, unsafe pedestrian crossings and the confluence of roadways provide us with an opportunity to upgrade how people access our downtown.

We look forward to working with the Boston Region Metropolitan Planning Organization, the Metropolitan Area Planning Council, the City of Woburn, the Town of Burlington, and our partners in the Legislature to make these projects a reality.

We appreciate your continued good work during these challenging times.

Sincerely,

Richard M. Haggerty
State Representative, 30th Middlesex District

Michelle L. Ciccolo
State Representative, 15th Middlesex District

Re: Capital Plan

Arthur Strang (Arthurstrang@msn.com) sent a message using the contact form at <https://www.ctps.org/contact>.

Is this plan relevant to the new public environment required by the Corona Virus?

Is the Plan relevant to the learned social distancing that we all have practiced?

This Plan does not effect electrified commuter rail nearly fast enough.

Where is the single purpose agency that speeds electrification on multiple lines at a time, engaging communities and value taxation to finance some of the cost, and responds to the likely "live out" rather than "live in" preference of families and individuals as a result of the Corona Virus?

This Plan does not effect in short order a cross Massachusetts, passenger service energetic for the economy and opportunities of the Berkshires and intervening communities.

This Plan does not have a 10 year deadline for the above.

ZIP code: 02138



Somerville Bicycle Advisory Committee

To: Secretary Stephanie Pollack May 11, 2020
c/o Matt Genova, TIP Manager, Boston Region Metropolitan Planning Organization
Via email: mgenova@ctps.org

CC: Mayor Joe Curtatone, Brad Rawson, David Mohler, members of SBAC

Re: FFYs 2021-25 TIP Public Comment Period

Dear Secretary Pollack,

As the Secretary of the Somerville Bicycle Advisory Committee (SBAC) I write to offer the Committee's support for important infrastructure projects related to facilitating bicycles as a safe and effective transportation mode in the Federal Fiscal Years (FFYs) 2021-25 Transportation Improvement Program (TIP).

The Somerville Bicycle Advisory Committee was established by the Board of Aldermen (now City Council) in 2001 to improve conditions for bicyclists in Somerville, promote bicycling as a means of transportation, improve safety conditions for bicyclists, and help implement policy, programs, and bike routes for all ages and abilities.

While we support all pedestrian, bicycling, transit, and complete street projects throughout the region, specifically in the TIP, the committee strongly supports:

- Accelerating planning and funding for the McGrath Boulevard Project (ID: 607981) in order to create a surface road that expands safe use to multiple modes of transportation: pedestrians, bicycles, and mass transit while allowing for better neighborhood connections.
- Continued investment in finalizing the Green Line Extension and Community Path Extension (ID: 1570) as they will play an important role in multi-modal transportation in the City of Somerville and surrounding communities. Going forward, we support funding any modifications to the final design necessary to improve bike access and parking at stations, modifying the community path to address any safety issues that arise due to the width or layout, improving path road crossings, and providing for safe connections to other regional multi-use paths including the Grand Junction Path and the Mystic River paths.
- Davis Square Signal Improvements (ID: S10785) to improve safe bicycle passage through the intersection, which is a critical intermodal transit hub within the city
- Signal and intersection improvements project at Mystic Ave and McGrath Boulevard (ID: 608562) will deliver badly needed safety improvements at a known dangerous intersection

These projects will help achieve the MPOs goals of increased safety while improving air quality and sustainability within Somerville and the region.

Sincerely,

Ted Lester
Secretary, Somerville Bicycle Advisory Committee
On behalf of the committee

Re: GHG Impact from 2021-2015 MPO TIP

Lucia Dolan (dolanlucia@gmail.com) sent a message using the contact form at <https://www.ctps.org/contact>.

Is a 0.04% reduction in Greenhouse Gas emissions the best we can hope for from a five year Boston Area Transportation Improvement Plan? "Addressing the environment and economic vitality" with a reduction of 11,700 metric tons per year of CO2 emissions. An estimated 30,400,000 metric tons of CO2 came from transportation each year (2017 <https://www.mass.gov/info-details/ghg-emissions-and-mitigation-policies#transportation->). 11,700 metric tons is a little less than 0.04% of 30.4 million metric tons. As a comparison, the State estimates ride hailing vehicles emit 100,000 metric tons of CO2 per year. Please correct my math if I am wrong!

ZIP code: 02459

MPO Liaison TIP Review Checklist

Completeness

ID	Review Item	Comments	Reference
A1	✓ * Table of Contents is accurate and internally-linked.		
A2	✗ * Document has no broken links.	Please correct the hyperlink in footnote 4 on page 4-17.	
A3	✓ * Document has no text or image placeholders.		
A4	✓ * Charts, tables, and maps are legible and properly annotated.		
A5	✗ * Document passes an accessible check.	Please ensure final document is properly bookmarked for ease of navigation.	
A6	✓ * Document is available in relevant languages per the MPO's Title VI Plan.		
A7	✗ * List of MPO members is current.	Appendix F incorrectly states that the MassDOT Rail and Transit Division has a dedicated representative on the MPO board.	
A8	✗ * Signatory sheet is included and accurate.	Please include signatory sheets in final document when endorsed.	
A9	✓ * Acronyms and partner agency lists are up to date.	Please consider removal of references to weMove and youMove.	
A10	✓ * Dates listed w/in TIP reflect FFY 2021–2025.		

Narrative

ID	Review Item	Comments	Reference
B1	✓ * TIP outlines MPO institutional organization.		
B2	✓ * TIP links back to national planning factors.		
B3	✓ * TIP references the RTP and the UPWP.	MPO Investment Programs are tied back to MPO Goals from the RTP, but there should be additional refinement and specificity regarding which investment programs target the improvement of which MPO Goals.	
B4	✓ * TIP narrative is concise and reader-friendly.		
B5	✓ * TIP discusses evaluation scoring.		
B6	✓ * TIP includes project scoring table.		
B7	✓ * TIP describes public participation process.		
B8	✗ * TIP includes procedures for adjustments and amendments, including any deviations from MassDOT guidelines.	Please include reference to the need for amendments in the event of significant changes in project scope regardless of change in project cost. See the STIP Amendment and Adjustment procedures in the 2021-2025 Draft STIP for guidance.	

B9	✗ *	TIP describes funding sources accurately.	Please include FHWA Ferry Boat Program (FBP) funding, which is annually allocated to ferry operators in the region.	https://www.fhwa.dot.gov/specialfunding/
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Performance Measurement

ID		Review Item	Comments	Reference
C1	✓ *	TIP includes discussion of target-setting process.		
C2	✓ *	TIP references relevant Transit Asset Management Plans.		
C3	✓ *	TIP references relevant TAM Plan(s).		
C4	✓ *	TIP includes current adopted performance targets.		PM1, PM2, PM3, TAM, and any regionally-derived targets
C5	✓ *	TIP discusses relationship between performance targets and project selection.		
C6	✓	Discussion on performance measures compares regional data to statewide data where available.		

Project Listing

ID		Review Item	Comments	Reference
D1	✓ *	Financial projections align with MassDOT guidance.		
D2	✓ *	TIP template is formatted correctly.		
D3	✓ *	Projects use MassDOT ProjectInfo TFPCs.		
D4	✓ *	Out year expenditures have the appropriate inflation assumptions.		2022: 4%; 2023: 8%; 2024: 12%; 2025: 16%
D5	✓ *	Projects use MassDOT ProjectInfo description.		
D6	✓ *	Additional comment field contains all necessary info.		Total cost, AC, Year-of-expenditure, TEC scores
D7	✗ *	MassDOT projects are (accurately) included into regional template.	Please add projects 610680 and 610674 to the State Prioritized Bicycle and Pedestrian projects in FFY 2025.	
D8	✓ *	Regional target projects adhere to Readiness Days feedback.		
D9	✓ *	List includes all projects, including FLAP, FLTP, and Tribal projects.		
D10	✓ *	Transit TIP is formatted properly.		Should be unchanged from GrantsPlus

Impact Analysis

ID		Review Item	Comments	Reference
E1	✓ *	TIP includes GHG certification.		
E2	✗ *	GHG analysis is available for all (and only) funded projects.	See E4.	
E3	✗ *	All projects are appropriately labeled as qualitative or quantitative.	Please include quantified GHG impact for 608067, 610544, and 610662.	
E4	✗ *	Transit projects have been analyzed for GHG.	Please include GHG analysis for completed and programmed transit projects.	

E5	✓*	Past and current TIP projects have been analyzed for geographic equity, including a relevant table of programming by municipality.		
E6	✓*	Past and current TIP projects have been analyzed for social equity.		
E7	✓*	Social equity analysis considers Title VI / language access.	While LEP populations were included in the social equity analysis, the analysis indicates potential disparities in impact between LEP and English-fluent populations. Please include additional discussion as to how MPO staff will investigate this potential disparity.	
E8	✓*	Social equity analysis considers EJ populations, including both federal and state definitions.		
E9	✓*	Equity analysis includes a narrative to accompany any figures.		

* indicates required by state or federal regulation.



May 20, 2020

To: Matt Genova
Boston Region Metropolitan Planning Organization
10 Park Plaza, Suite 2150
Boston MA, 02116

From: The Institute for Transportation and Development Policy (ITDP)

Re: Draft Boston Region Metropolitan Planning Organization Transportation Improvement Program

Dear Mr. Genova and Boston MPO Leadership,

Thank you for this opportunity to provide public comment on the Boston Region's Metropolitan Planning Organization (MPO) Transportation Improvement Program (TIP) for FY 2020-2024. ITDP is a non-profit that works around the world to design and implement high quality transport systems and policy solutions that make cities more livable, equitable, and sustainable. Since 2012, we have been working in Boston to explore, demonstrate and promote the potential for bus rapid transit (BRT) as a solution to the region's transportation, economic, equity and environmental challenges while effectively achieving the goals of GoBoston 2030 and the Global Warming Solutions Act.

We are pleased to see the MPO increase funding and include new investment programs and project types that focus on improving both transit service and the transit experience, specifically through the addition of dedicated bus lanes to the Complete Streets investment program and the addition of a new Transit Modernization investment program as well as support for dedicated bus lanes. Through successful pilots of bus priority features such as dedicated bus lanes, level boarding and transit signal priority, buses have truly experienced a renaissance in the Boston region and this plan reflects that momentum. We are concerned about the scope of some high-value projects, in particular, the investments in the Rutherford Avenue corridor which will still result in a highway-like roadway with minimal improvements for people walking, riding bicycles, or using transit and which perpetuate the very auto-centric planning principles that our state and regional policy goals seek to reverse.

As opportunities for dedicated bus lanes and BRT increase throughout the region by way of the new Complete Streets program, it will become important for the various processes of implementation to be coordinated between key agencies. Questions that we encourage the MPO to clarify will include, but are not limited to the following: How will this funding source work in conjunction with the funding the MBTA has put aside to fund new dedicated bus lanes? How will the placement of bus lanes relate to the bus network redesign project, and how will these be coordinated with MassDOT and the MBTA?

Specific TIP Items

We appreciate the specificity for projects in the TIP which include bus priority, in particular:

- **The Concord Avenue Transit Signal Priority project in Cambridge.** While this corridor is not well-suited for BRT, we hope that the low-cost improvements here can be a catalyst for larger nearby projects which can include more elements.
- **The North Washington Bridge project in Boston,** which will include an inbound bus lane as part of the project. We would suggest that an evaluation take place of traffic and congestion during the project, when there will only be a single outbound lane, to see whether, at the completion of the project, the outbound lane is sufficient for vehicular traffic and the second outbound lane could be converted to a bus lane. With five bus routes and as many as 30 buses per hour, this is one of the busiest single roadways for transit passengers in the state.
- **Mount Auburn Street in Watertown.** While this is a complete street road diet project, we are worried it will lead to more congestion without the ability for transit vehicles to bypass this congestion. We would suggest improvements to assure that buses do not encounter any traffic at intersections and can reliably and quickly make the trip between Watertown Square and the existing bus lanes in Cambridge. It is worth noting that this corridor was part of the 2018 Mount Auburn Street joint pilot between Cambridge and Watertown which featured queue jump lanes for buses at two intersections in Watertown and resulted in highly positive responses from riders. We believe additional opportunity exists to improve the level of priority for buses as part of this project and that it would be well received by the community.
- **Ferry Street and a portion of Elm Streets in Everett.** While this project is not particularly related to transit, care should be taken so as not to preclude this corridor from serving as an alternate route for vehicle traffic should Broadway in Everett be recast as a transit-priority corridor.
- **Rutherford Avenue in Boston.** Given the scope of this project, and the price tag of \$152 million, it is imperative that this corridor is built with future mobility in mind. Today, this eight- to ten-lane roadway carries just 50,000 vehicles per hour, and the demand is unbalanced, with about 30,000 southbound vehicles and 20,000 northbound vehicles. A recent ITDP analysis and traffic count suggests that no more than two lanes are needed for southbound traffic, and that northbound traffic could be accommodated with a single lane. Yet the proposed project retains six lanes for nearly the entire length of the project. While it does increase green space and drainage and build a safer bicycle and pedestrian facility, no accommodation is made for the roadway to serve as an eventual transit corridor with the potential to connect a Gateway City (Everett) to jobs in downtown Boston.

This is important because the current bus network is set up to require all passengers from the north to transfer at Sullivan Square to the Orange Line (or to the 92 and 93 buses, which run parallel to this corridor). A true BRT corridor here would allow direct bus service from Everett, Malden, Medford and Somerville to Downtown Boston, reducing crowding on one of the most overburdened portions of the rapid transit system and reducing the overall trip time for many Boston-bound passengers. Once the North Washington Bridge is completed, this would allow a continuous bus lane from Everett and Somerville through Sullivan Square to Haymarket Square and, based on a City of Boston plan for a Center City Link busway, to South Station and beyond.

Furthermore, we believe that the current plan, which retains underpasses at Sullivan Square and Austin Street, should be restudied, as previous plans showed the feasibility of an all at-grade

plan which would create a less highway-like environment, slowing traffic, creating a safer roadway, and reducing emissions. We believe this roadway should be designed with the current and future needs of people using transit, bicycles, and walking first, as the current 1950s-era highway design is obsolete and should not be replicated for the next century. A redesign would also position this high-cost project to successfully meet the LRTP's established goals of all projects achieving safety for all modes and creating an environmentally friendly transit system.

We appreciate the Universe of Project list provides context about each project, including an in-depth description of the project, how they relate to the MPO's goals and maps of the proposed project area. The added integration of infographics to interpret an otherwise complicated process is also appreciated.

Thank you for considering our comments and please do not hesitate to reach out to us with any questions.

Sincerely,

A handwritten signature in cursive script that reads "Julia Prange Waller".

Julia Waller, Boston Program Manager

Julia.waller@itdp.org



200 FRIBERG PARKWAY
WESTBOROUGH, MA 01581
774-760-0495
495PARTNERSHIP.ORG

May 21, 2020

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

RE: Boston Region Metropolitan Planning Organization's draft Transportation Improvement Program, FFY 2021-2025

On behalf of the 495/MetroWest Partnership, please accept the following as our official comments to the Boston Region Metropolitan Planning Organization (Boston MPO) regarding the draft *Transportation Improvement Program* (TIP) for FFY 2021-25.

The 495/MetroWest Partnership is a non-profit advocacy organization serving thirty-five communities, with over 600,000 residents and approximately 1 in 10 jobs in the Commonwealth. Through a unique private-public collaboration with businesses, municipal governments and other stakeholders, the Partnership seeks to address regional needs by working to enhance economic vitality, improve quality of life and foster sustainable growth. The Partnership focuses on helping to alleviate regional constraints, and conducts numerous initiatives on transportation, economic development, workforce housing, and water resources.

Given the unprecedented economic challenges facing the Commonwealth and our region as a result of the COVID-19 pandemic, we recognize the diligence of the Boston MPO and your continued efforts in cultivating a resilient regional transportation network. We recognize that existing fiscal challenges related to the state's transportation infrastructure, already a key topic of public and legislative discourse, are deepening due to a sharp and sustained drop in MBTA ridership and toll revenues. Although the nature of regional transportation concerns have temporarily and drastically changed in just a few short months, addressing issues such as gaps in public transit coverage and aging transportation infrastructure will be paramount to accelerating short and long-term economic recovery for the region.

The Partnership greatly appreciates the 495/MetroWest projects included in the FFY 2021-2025 TIP. The Partnership strongly supports the inclusion of the following projects in the current draft TIP (with newly added projects emboldened for reference).

FFY 2021

- **607748 - Acton Intersection and Signal Improvements on Routes 2 and 111 (Massachusetts Avenue) at Piper Road and Taylor Road**
- **608443 - Ayer and Littleton: Intersection Improvements in Route 2A at Willow Road and Bruce Street**

- 608228 - Framingham: Reconstruction of Union Avenue, from Proctor Street to Main Street
- 608467 - Marlborough and Sudbury: Resurfacing on Route 20 in Sudbury and Marlborough
- 608637 - Maynard: Bridge Replacement, M-10-006, Florida Road over Assabet River
- 608045 - Milford: Rehabilitation on Route 16, from Route 109 to Beaver Street

FFY 2022

- 608229 - Acton Intersection Improvements at Massachusetts Avenue (Route 111) and Main Street (Route 27) (Kelley's Corner)
- 608887 - Bellingham: South Main Street (Route 126), from Mechanic Street (Route 140) to Douglas Drive
- 608599 - Canton, Foxborough, Norwood, Sharon, and Walpole: Stormwater Improvements Along Route 1, Route 1A, and Interstate 95
- 608480 - Foxborough, Sharon, Walpole: Resurfacing and Related Work on Route 1
- 608164 - Sudbury: Bruce Freeman Rail Trail, Phase 2D
- 607977 - Hopkinton and Westborough: Reconstruction of Interstate 90/Interstate 495 Interchange

FFY 2023

- 608889 - Framingham: Traffic Signal Installation at Edgell Road at Central Street
- 609530 - Medway: Holliston Street and Cassidy Lane Improvements (SRTS)

FFY 2024

- 608436 - Ashland: Rehabilitation and Rail Crossing Improvements on Cherry Street
- 609054 - Littleton: Reconstruction of Foster Street
- 608255 - Stow: Bridge Replacement, S-29-11, Box Mill Road Over Elizabeth Brook
- 603739 - Wrentham: Construction of I-495/Route 1A Ramps

FFY 2025

- 610722 - Acton, Foxborough, and Littleton: Pavement Preservation on Route 2
- 609402 - Framingham and Natick: Resurfacing and Related Work on Route 9
- 610660 - Sudbury and Wayland: Mass Central Rail Trail (MCRT)

We greatly appreciate the inclusion of funding for projects #608045 in Milford and #609530 in Medway, which were not included in last year's draft TIP. We are, however, equally concerned that projects #608889 and #609402 in Framingham, as well as project #608255 in Stow, have been moved to later funding years. We are disappointed that #603739 - Construction of I-495/Route 1A Ramps in Wrentham was moved from FY23 to FY24; this particular need was highlighted in our 2014 *495/MetroWest Top Ten Transportation Nightmares* (#8 on our list), and remains a significant concern.

We commend MassDOT and the Baker-Polito Administration for their leadership in funding the long-needed I-495/I-90 Interchange Improvement project, and advancing it through to the Final

Environmental Impact Report. We continue to look forward to the positive impacts this project will have on not only the 495/MetroWest region, but on the many motorists from around the Commonwealth who utilize this interchange on a daily basis. A related project, the I-495/Route 9 interchange project, deserves future funding consideration given its proximity and interdependency with the I-495/I-90 interchange, the potential unlocking of over 1 million square feet of development in the area with such sites as the Dell EMC property, and the interchange's key role in freight serving all of Eastern Massachusetts.

Consistent with our record of addressing suburban mobility challenges, promoting regional connectivity projects and accentuating our region's natural landscapes and recreational opportunities, the Partnership supports the two rail trail expansion projects in our service area: #608164 Bruce Freeman Rail Trail (Phase 2D) into Sudbury, and #610660 Sudbury and Wayland - Mass Central Rail Trail. After decades of funding restrictions, the Bruce Freeman Rail Trail enjoys great support and popularity. With the addition of Phase 2D, Bruce Freeman Rail Trail will connect with the Mass Central Rail Trail if funding remains programmed for FY25. Additionally, we are hopeful that #608995 - Sudbury - Stow - Hudson - Mass Central Rail Trail Wayside will be reintroduced in the next TIP cycle.

The Partnership would also like to express our disappointment that the following projects, which were included in last year's draft TIP, have subsequently been removed from the FY21-25 draft TIP:

- 608566 - Marlborough - Improvements at Route 20 (East Main Street) At Curtis Avenue
- 608006 - Framingham - Pedestrian Beacon Hybrid Installation at Route 9 and Maynard Road
- 608948 - Bellingham - Franklin - Southern New England Trunk Trail (SNETT) Construction
- 608995 - Sudbury - Stow - Hudson - Mass Central Rail Trail Wayside

We are particularly disappointed by the omission of project #608006 - Pedestrian Beacon Hybrid Installation at Route 9 and Maynard Road in Framingham. Spanning back to 2010, 41 pedestrians have been struck by vehicles on Route 9 in the MetroWest region, resulting in 6 fatalities; of which, 29 accidents and 2 fatalities occurred in Framingham. Furthermore, MassDOT released data earlier this month indicating that despite a 50% statewide reduction in traffic volume on major highways in April 2020 compared to April 2019, roadway fatality statistics remained the same. Although the Route 9 corridor is critical for commercial activity and vehicular transport in Framingham, stretches remain unsuitable for pedestrian use and gaps between crosswalks frequently exceed one mile. The project area is located in the vicinity of Framingham State University, and would provide another access point to Framingham Center.

The Partnership also strongly supports the MPO's increased funding to the MetroWest RTA. The #3 Nightmare in 495/MetroWest was identified as "Suburban Mobility Challenges: First Mile, Last Mile & a Few in Between," which speaks to the continued need for expanded transit services in our region. The funding for various MetroWest RTA projects is essential to the growth of transit options in our region, which again serves not only our social and economic needs, but advances the state's goals for greenhouse gas emission reductions. For that reason, we support the dispersion of capital funds towards RTA facility and system modernizations related to fleet electrification.

The MetroWest RTA has proven a good steward of any and all state and federal resources, continually expanding services as well as bringing innovation to the system, such as their creation of the "Catch" mobile app, which allows Framingham/Worcester commuter rail line commuters to notify MWRTA bus operators of commuter rail service delays to create dynamic, on-the-spot scheduling alterations to accommodate passengers wishing to make a connection. The Partnership strongly supports all of

the resources made available to the MetroWest RTA in this TIP; growing these services is essential, as noted by the state's RTA Working Group. While the Partnership appreciates this level of funding for the MWRTA, given the state's RTA Working Group report and the ongoing state budget deliberation, we look forward to expanding upon this support in future years.

We appreciate the ongoing reforms at MassDOT and the MBTA under the leadership of Governor Baker, Lt. Governor Polito, and Secretary Pollack. We recognize the MPO was limited in its financial capacity to fund new projects in the FFY21-25 TIP given cost increases for many projects programmed in previous TIP cycles. We also recognize the impact that COVID-19 will have on forthcoming annual state budgets and legislative priorities as we cautiously ease social restrictions and progress towards a phased reopening the economy. Against this backdrop, we offer our support for the following projects in the TIP universe and LRTP (with longstanding advocacy for such projects emboldened):

- **609280 - Roundabout Construction at Salem End Road, Badger Road and Gates Street**
- **605313 - Bridge Replacement, Route 27 (North Main Street) over Route 9 (Worcester Street) and Interchange Improvements**
- **606109 - Intersection Improvements at Route 126 and Route 135/MBTA and CSX Railroad**
- **607774 Resurfacing and Intersection Improvements on Route 140, from Beaver Street to I-495 Ramps**
- **604862 Ramp Construction and Relocation, I-495 at Route 127 (Hartford Avenue)**
- **South Main Street (Route 126)—Elm Street to Douglas Drive Reconstruction (No Project # Assigned)**

Again, thank you for the significant investment in the region in this proposed TIP, and we appreciate your consideration of our comments. If there are any questions regarding these projects or our commentary on the TIP, please feel contact me. The Partnership appreciates your time and consideration, and looks forward to continuing to work with the MPO, MassDOT, District Three, CTPS, municipal governments, and private sector stakeholders.

Sincerely,



Jason Palitsch
Executive Director
The 495/MetroWest Partnership
(774) 760-0495
jason@495partnership.org

Cc: Matt Genova, TIP Manager
John Bechard, Highway Division
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May 21, 2020

Via Online Comment and E-mail

Boston Region Metropolitan Planning Organization
Certification Activities Group, Central Transportation Planning Staff
State Transportation Building, 10 Park Plaza, Suite 2150
Boston, MA 02116-3968
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Subject: Comments on Transportation Improvement Program: FFYs 2021-25

Dear Members of the Boston Region Metropolitan Planning Organization:

Conservation Law Foundation (“CLF”) is pleased to submit these comments on the Transportation Improvement Program: FFYs 2021-25 (“TIP”). CLF is a non-profit, member-supported organization dedicated to protecting New England’s environment. CLF protects New England’s environment for the benefit of all people and uses the law, science, and the market to create solutions that preserve our natural resources, build healthy communities, and sustain a vibrant economy. CLF has a long history of advocating for transportation systems that are accessible, reliable, efficient, affordable, and free of air pollution and greenhouse gas emissions.

CLF supports the advances in environmental protection and equity reflected in this TIP and offers recommendations to strengthen the TIP.¹ Below, in more detail, we support the inclusion of a detailed transportation equity analysis and recommend the following improvements: (1) give more effect to the results of the equity analysis; (2) lessen reliance on transportation control measures (“TCM”) and state implementation plan (“SIP”) clean air commitments; (3) include funding for the Green Line extension (“GLX”) to Route 16 and the Red-Blue Connector; (4) require that any vehicle purchases be electric or zero-emission vehicles; and (5) require that all infrastructure investments be designed for climate resiliency.

¹ Transportation Improvement Program, FFYs 2021-25, <https://www.ctps.org/data/pdf/plans/TIP/FFYs-2021-2025-Draft-TIP-Public-Review.pdf>.

1. The TIP Should Direct More Resources to Projects Benefitting Environmental Justice Populations.

CLF is concerned that an insufficient amount of the major infrastructure projects funded by the MPO are serving environmental justice populations comprised of low-income residents, residents of color, and Limited English Proficient populations. In measuring the emission impacts on transportation equity populations, the TIP concludes that the emissions reductions of carbon monoxide, volatile organic compounds, and nitrogen oxides benefit the elderly population, low-income, and transit-dependent households at amounts greater than their respective share of the general population.² The TIP concludes that emissions reductions associated with the target-funded projects benefit people of color, Limited English Proficiency populations, and people with disabilities at amounts fewer than their respective general populations.³ The TIP further concludes that people of color, Limited English Proficient populations, and low-income and transit-dependent populations receive less funding when compared to their respective general populations.⁴

Transportation equity allows people — no matter their race, age, physical ability, income, or immigration status — to move freely between the places they live, learn, work, worship, and play. Further, transportation equity includes transportation systems that are affordable, reliable, and safe and do not jeopardize one community to benefit others. The funding project distribution in the TIP does not sufficiently advance the goals of transportation equity.

We recognize that transportation equity is the only MPO goal that is not also reflected in a MAP-21 federal goal⁵, and appreciate the inclusion of a new section on equity analysis in Chapter 6. Notwithstanding, we strongly urge that this analysis be tied to binding equity performance standards. For example, per capita emissions reductions and per capita funding for transit projects should be required to prioritize transportation equity populations.⁶ As is shown in Tables 6-4 and 6-5, implementation of the regional target-funded projects will perpetuate inequities in air pollution and transportation investment for minority populations and populations with limited English proficiency. According to Table 6-4, nonminority populations will benefit from a 25 percent greater air pollution reduction than minority populations, thus widening an already unacceptable environmental justice gap. People fluent in English will benefit from a 65 percent greater reduction than those with limited English proficiency. Table 6-5 shows similar funding discrepancies.

² Transportation Improvement Program, FFYs 2021-25, at 6-7, <https://www.ctps.org/data/pdf/plans/TIP/FFYs-2021-2025-Draft-TIP-Public-Review.pdf>.

³ *Id.*

⁴ Transportation Improvement Program, FFYs 2021-25, at 6-8, <https://www.ctps.org/data/pdf/plans/TIP/FFYs-2021-2025-Draft-TIP-Public-Review.pdf>.

⁵ Transportation Improvement Program, FFYs 2021-25 at 3-60, <https://www.ctps.org/data/pdf/plans/TIP/FFYs-2021-2025-Draft-TIP-Public-Review.pdf>.

⁶ Transit Equity Populations, as defined in the TIP, include “minority population, people with limited English Proficiency, Elderly (age 75 or older), people with disabilities, low-income households, and transit-dependent households.” Transportation Improvement Program, FFYs 2021-25 at Table 6-1, <https://www.ctps.org/data/pdf/plans/TIP/FFYs-2021-2025-Draft-TIP-Public-Review.pdf>.

These figures should disqualify this program from implementation. Not only does this plan fail to mitigate inequities that are the result of decades of environmental racism, it perpetuates the problems by widening the equity gaps. We advocate that binding measures be implemented to ensure that the TIP not knowingly perpetuate or exacerbate inequities on transportation equity populations.

Under the Massachusetts 2002 Environmental Justice Policy, approximately 44 percent of the Commonwealth's census block groups were classified as environmental justice communities.⁷ Under the Massachusetts 2017 Environmental Justice Policy, approximately 72 percent of the Commonwealth's census block groups were classified as environmental justice communities.⁸ Pending legislation offers a different definition of environmental justice community that could potentially identify approximately 41 percent of the Commonwealth's census block groups as environmental justice communities.⁹ CLF urges the MPO to ensure that the percent of major infrastructure projects funded by the Boston MPO located in and serving environmental justice populations is at least as high as the percent of Commonwealth census blocks classified as environmental justice populations: a range of 41-72 percent.

Environmental justice communities disproportionately suffer the negative impacts of transportation emissions. Asian American residents in Massachusetts are exposed to PM_{2.5} concentrations from on-road transportation that are, on average, 36 percent higher than the exposure of white residents while African American residents are exposed to 34 percent more vehicle pollution than white residents and Latinx residents are exposed to 26 percent more pollution.¹⁰ As temperatures rise, so will rates of asthma and respiratory disease in neighborhoods through the Commonwealth as increased heat exacerbates the impacts of air pollution.¹¹ It is necessary to prioritize transportation investments that could and should result in air quality improvements in environmental justice communities.

2. The TIP Does Not Include Sufficient Protections for Clean Air.

We appreciate the MPO's support for emissions reductions for GHG and other pollutants and are concerned that the TIP does not include sufficient protections to ensure clean air for everyone. Monitoring and performance standards outlined in Chapter 4 for Clean Air and Sustainable

⁷ Massachusetts Environmental Justice Policy at 3 (2002), <https://www.mass.gov/files/documents/2017/11/29/ej%20policy%202002.pdf>.

⁸ Massachusetts Environmental Justice Policy at 3 (2017), https://www.mass.gov/files/documents/2017/11/29/2017-environmental-justice-policy_0.pdf.

⁹ S.464/H.761, An Act Relative to Environmental Justice and Toxics Reduction in the Commonwealth; S.423/H.826, An Act Relative to Environmental Justice in the Commonwealth.

¹⁰ Union of Concerned Scientists: *Inequitable Exposure to Air Pollution from Vehicles in Massachusetts: Fact Sheet*, at 1 (June 2019), <https://www.ucsusa.org/sites/default/files/attach/2019/06/Inequitable-Exposure-to-Vehicle-Pollution-MA.pdf>.

¹¹ See H. Orru et al., *The Interplay of Climate Change and Air Pollution on Health*, 4 Current Env'tl. Health Report 504, 504 (2017) ("In general, climate change is expected to worsen air quality in several densely populated regions by changing atmospheric ventilation and dilution, precipitation and other removal processes and atmospheric chemistry.")

Communities only address regional reductions, and TCM commitments outlined in Chapter 5 for Determination of Air Quality Conformity have been repeatedly delayed or outright abdicated.

With respect to air quality performance standards in Chapter 4, we encourage monitoring and performance standards for any non-GHG pollutants be done on a local scale rather than a regional scale. While the impact of GHG pollution is global, the impacts of other pollutants is much more local, impacting the people and communities where the higher levels of pollutants are located. Emissions reductions viewed only at a regional scale does not ensure that those emissions reductions are distributed equitably – reductions focused in areas with the worst air pollution, or even equally; achieving regional emissions reduction goals by achieving higher emissions reductions in parts of the region with the cleanest air only achieves the goal of clean air and sustainable communities for some people.

With respect to the TCM and SIP Transit Commitments outlined in Chapter 5, MassDOT has, for decades, repeatedly missed deadlines and actively sought to be relieved from uncompleted clean air commitments. Two examples, both discussed in more detail below, are the delay in the Green Line Extension and the abdication of the Red-Blue Connector. The section titled *Timely Completion of Transportation Control Measures* identifies that the Green Line Extension is required by the SIP to have been completed by 2014.¹² CLF has raised concerns about the inadequacy of the mitigation measures in place, and lack of monitoring or performance assessment for those measures.

Based on this history, without further assurances, the MPO cannot reasonably rely on timely completion of the clean air commitments outlined therein to meet air quality requirements for this TIP.

3. The Green Line Extension Should be Funded to Route 16 in Medford.

CLF supports funding for the Green Line Extension to College Avenue with Union Square Spur in Cambridge, Somerville, and College Avenue in Medford.¹³ We request additional funding to support the Green Line Extension to Route 16 in Medford. To the extent that the Green Line Extension to Route 16 in Medford is not fully funded in the Capital Investment Program, this project should be funded in this TIP. This funding would provide essential public transportation services to a densely populated and underserved part of the region. This project will reduce greenhouse gas emissions, helping to meet the Commonwealth's obligations pursuant to the Massachusetts Global Warming Solutions Act and GreenDOT, which mandates the MPO to take GHG emissions into account for purposes of Transportation Improvement Program planning. It also will provide more equitable access to transit—and thus to increased economic and educational opportunities—to five state-defined environmental justice communities (two in Somerville, two in Medford, and one in Arlington). The Green Line Extension project cannot be deemed complete without operation of trains to Route 16 in Medford.

¹² Transportation Improvement Program, FFYs 2021-25 at 5-6, <https://www.ctps.org/data/pdf/plans/TIP/FFYs-2021-2025-Draft-TIP-Public-Review.pdf>.

¹³ *Id* at 3-60.

4. The TIP Should Fully Fund the Red-Blue Connector.

To the extent the project is not fully funded in the Capital Investment Program for fiscal years 2021-2025, funding for construction of the Red-Blue Connector should be included in the TIP. This project should be a high priority for the MPO considering the value of the project in advancing the goals of the MPO, particularly clean air and sustainable communities, transportation equity, and economic vitality.

The Red-Blue Connector should be a high priority for several reasons. As the MBTA describes in the *Focus 2040* report:¹⁴

A Red-Blue Connector would provide more direct transit service between fast-growing employment hubs and residential areas, including communities with concentrations of low-income households. It would also enhance access to the Blue Line connection to Logan Airport, which will be increasingly important as the Silver Line faces worsening highway congestion and projections point to continued growth in air travel to and from Boston.

Put otherwise, the Red-Blue Connector would complete the legacy inner core subway system and serve as a pressure release valve for the other lines. Today, Park Street and Downtown Crossing are often at or over capacity and Government Center will face its own pressures once the Green Line Extension goes into revenue service. The Red-Blue Connector would add much-needed capacity to the system. It would also provide access to key job centers and destinations: Logan Airport, MGH/Mass Eye and Ear, Kendall Square innovation district, plus MIT and Harvard. Access to and from jobs should be a central mission for any transit agency. The Connector would add access to and from housing - especially new housing coming to Suffolk Downs and elsewhere on the Blue Line. Lastly, the Connector would advance social equity in the Boston area: a single parent with a sick child in East Boston should be able to get to MGH's front door on the Blue Line, just as a senior citizen with limited mobility deserves a route to Logan that does not involve the congested Ted Williams Tunnel.

5. All Vehicle Procurements, Including Bus and Van Purchases, Should be for Electric or Zero-Emission Vehicles.

CLF supports the replacement of current diesel fleet vehicles, as is outlined in the TIP, and we advocate that any new vehicles be electric or zero-emission vehicles. Electrifying buses reduces the climate impact of public transit and eliminates air pollution from these vehicles along their fixed routes, thus protecting the health of the drivers, riders, and people who live along the routes.

¹⁴ Focus40: The 2040 Investment Plan for the MBTA, (March 2019), <https://www.mbtafocus40.com/>.

Electric vehicles (“EVs”) are much cleaner than their conventional gasoline and diesel counterparts, even when accounting for power plant emissions associated with charging EVs. These vehicles are also unique in their ability to become even cleaner as the electricity grid is increasingly powered by low- and zero-emissions power. EVs also do not emit PM or NOx from tailpipes, directly impacting local air quality.

While replacing diesel buses and vans with hybrid vehicles is a step in the right direction, it would be out of step with the pace necessary to meet our climate targets. Vehicles purchased now could be in service for years or potentially decades and may need to be replaced with electric or zero-emission vehicles before the end of their useful life to meet Massachusetts climate targets in coming years.

6. All Infrastructure Investments Should Include Climate Resilience.

We are thankful that consideration of the resilience of infrastructure is included as a component of the System Preservation goal, but assert that climate resilience must be a standalone prerequisite to any future infrastructure capital investment project. Ensuring that infrastructure is climate resilient advances many of MPO’s goal areas in addition to system preservation, including safety and economic vitality.

In addition to advancing system preservation, ensuring that transportation infrastructure is climate resilient makes the transportation system safer by raising structures, thus reducing flooding, and hardening structures, reducing failure or collapse in extreme weather events. Climate resilience also advances economic vitality in that regions and communities with resilient infrastructure rebound from disasters more quickly.

CLF appreciates the opportunity to submit these comments. You may direct any questions to Staci Rubin at SRubin@clf.org and (617) 850-1781.

Sincerely,



Staci Rubin, Senior Attorney

May 21, 2020

To: Matt Genova
Boston Region Metropolitan Planning Organization
10 Park Plaza, Suite 2150
Boston, MA 02116

From: LivableStreets Alliance

Re: Boston Metropolitan Planning Organization FFY 21-25 Draft Transportation Improvement Program

Dear Mr. Genova and Boston MPO Board,

Thank you for inviting public comment on this draft of the Federal Fiscal Year 2021- 2025 Transportation Improvement Program (TIP). For over 15 years, LivableStreets Alliance has advocated for streets that connect people to the places where they live, work, and play.

Our current programs include advocating for:

- **Emerald Network:** our vision for a 200-mile system of greenways in Greater Boston
- **Vision Zero:** the effort to systematically improve traffic safety in cities and towns
- **Better Buses:** systemwide improvements to optimize and prioritize bus transit

We have reviewed the draft FFY 2021-2025 TIP and would like to provide the following comments:

Cost Containment

This year thirty-one projects saw cost increases, with nineteen of these projects showing increases over \$1 million. There are many valid reasons why these projects may have had increased costs, however, we notice there are no effective cost controls in place to hold municipalities, or their contracted partners accountable. We strongly recommend the MPO create clear accountability metrics and increase public oversight to prevent these significant and unexpected adjustments in funding.

We recommend the MPO waits until 75% design before adding projects as part of the TIP. As the agencies providing funding, the MPO and MassDOT are in a uniquely well-suited position to adjust and improve the accountability of consultants/ contractors to more accurately estimate costs. In order to do this, we recommend projects not be accepted in the TIP until they are further along in their design process. At the current 25% design review phase, there is a great deal of uncertainty, both in terms of the design specifics, and the community engagement process and potential adjustment of project scope. An iterative process always leads to better results, but also leads to

many changes along the way. If, instead of programming projects at 25%, the MPO waits until the 75% design, then cost estimates will be significantly more accurate and the same significant increases we saw in this year's TIP process will be eliminated. In addition, by waiting to fund projects until 75% design, this will remove the liability of programming projects into the TIP and then having no repercussions for increasing the costs as the project progresses.

We understand that going through this lengthier design process will require more upfront costs, and that without the assurance of funding, many cities and towns may not have the budgets to move projects forward all the way to the 75% design. We appreciate this challenge and recommend that there be a process through which MassDOT can financially support the design process, ensuring that reaching 75% design is achievable for cities and towns. Through this process there should be additional opportunities for transparency and accountability, so that transportation funds are spent effectively and projects remain reasonable on budget. With this new process we believe projects will achieve our regional goals, be reflective of local needs, and be the best use of our limited transportation funds.

Transit Modernization Program

While we are happy to see funding being set aside starting in 2025 for the Transit Modernization Program, we think it is prudent to clarify how this money will be spent in order to program the correct amount. We understand the MBTA, MassDOT, and the MPO are working to determine the type of projects this program will fund, when parameters are put on this funding we request the MPO allow the public to provide comment and shape how this funding is used.

Rutherford Ave Project

We would like to echo the comments provided by ITDP regarding this project. We also strongly recommend the Rutherford Ave project be adjusted in scope to allow for Bus Rapid Transit and reduced number of traffic lanes for private vehicles. This important corridor can allow for a single seat ride between Everett and Downtown, a key aspect of this project to allow people to choose this mode of travel. In addition, the redundancy is a benefit to both reduce crowding along this already crowded section of the orange line and also to provide more quality choices other than car-based modes. If we are serious about modeshift and achieving our climate goals, the prioritization of other modes is critical.

Organization

We were happy to see multiple adjustments to the TIP website to improve access and usability. However, there are still some steps that could be taken to make this process more legible.

The TIP database is a great resource. We applaud the CTPS staff for creating this helpful and visually appealing tool. The color coded dots to indicate project type are also immensely helpful to see the

regional spread of project types and allow members of the public or municipalities to focus on their localities. However, this wonderful tool is hidden within the TIP program page. We suggest this map be more clearly named on the project page and integrated into the TIP report with a link to the web-based page.

Within both the TIP database and the TIP program table we recommend a couple of adjustments regarding what and how information is presented.

For clarity, we recommend the TIP provides more clarity regarding which TIP projects are funded by the MPO and which are funded by MassDOT federal funds, along with a note in the MassDOT section about why this is different. In the TIP program table we recommend having two separate charts -- one where the TIP projects are located and the other for MassDOT projects. As the MPO is only collecting feedback on MPO funded projects during this process, a separate table would make it easier for members of the public to share useful feedback. In the TIP database we recommend MassDOT funded projects receive a different color coding scheme.

Lastly, we recommend an additional column be added to the TIP program table to highlight changes as compared to the previous year's TIP. Members of the public should transparently be able to see if new projects have been added or removed each year, if project costs have shifted (especially if the change surpasses the \$20M major infrastructure project threshold), and the reason(s) why projects' costs have increased.

Thank you for considering our comments.

Sincerely,

Kristiana Lachiusa
LivableStreets Alliance

MBTA Rider Oversight Committee

May 21, 2020

RE: FY 2021-25 Draft Transportation Improvement Program

Dear Members of the Boston MPO,

Below are comments from the Capital Investment & Finance Subcommittee of the MBTA Rider Oversight Committee regarding the Draft FY2021-25 Transportation Improvement Program (TIP)

1. We are especially pleased to see the amount of funding for the Signals and Systems Program, particularly for the Infrastructure and Asset Management Program for the MBTA (CIP #R0020).
2. We are pleased to see the first set of projects selected as part of the Community Connections Program. There is some concern, however, as to how the Newton Microtransit Service Project (S10784) and the Sharon Carpool Project Marketing Project (S10787) will be affected by the COVID-19 pandemic.
3. We support the ongoing development and implementation of Performance-Based Planning and Programming as described in Chapter 4. We are pleased to see the level of detail in the evaluation process. We can appreciate the difficulty in deriving metrics for economic vitality, and we look forward to seeing how that progresses in the next TIP. Finally, we can't emphasize too strongly how important it is to do before/after assessments for all projects that lend themselves to measurements. The ability to make better decisions depends on our ability to assess the effectiveness of projects that have been implemented.
4. Finally, we approve of the extensive efforts to engage the public and to get a wide array of input into the TIP development process, and that includes the production of a draft that is not only thorough in the materials presented, but also laid out in a clear and logical manner. The material is dense, and the subject matter is complex, but the MPO staff has done an excellent job in making the content intelligible.

Respectfully,

The Capital Investment & Finance Subcommittee of the MBTA Rider Oversight Committee

REGIONAL TRANSPORTATION

ADVISORY COUNCIL



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

Re: Draft Federal Fiscal Years 2021-2025 Transportation Improvement 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 with providing public input on transportation planning and programming to the Boston Region Metropolitan Planning Organization (MPO).

The RTAC has reviewed and discussed the draft Federal Fiscal Years (FFYs) 2021-2025 Transportation Improvement Program (TIP) and offers the following comments.

1. The Advisory Council appreciates the MPO's commitment to meeting funding targets by project category as set forth in the Long Range Transportation Plan, and especially the significant investment made in recent TIPs and the proposed FFYs 2021-25 TIP in Complete Streets projects.
2. The Advisory Council is pleased to see the Community Connections program funded and looks forward to seeing the results of the first five projects proposed projects, as well as additional programming of funding in future years.
3. The Advisory Council appreciates the continued time and effort of the MPO to measure and address equity in project scoring, project selection, and overall evaluation of the TIP.
4. Given the limited funding available for new projects in 2025, the Advisory Council concurs with the approach of funding the highest scoring project(s) in each funding category.
5. Considering the limited funding available in 2025 and the current balance of funding directed to Major Infrastructure projects, the Advisory Council agrees with the decision not to fund the McGrath Highway project in 2025. The Advisory Council nevertheless believes this is a worthwhile project with important community benefits and hopes that it can be funded in 2026 and beyond.
6. The Advisory Council is concerned about the extent of cost increases for projects already in the TIP (31 of 47 projects, with 19 increases over \$1 million), and concerned that if this trend continues, future TIPs may not be able to meet expectations that are originally set, requiring more projects to be pushed out to later years or not funded. This may have a compounding effect as project delays can lead to increased costs. The Advisory Council suggests considering the following options:

- a. Can the MPO and/or the Massachusetts Department of Transportation (MassDOT) provide incentives and/or resources to encourage better cost estimation at the beginning of the project? For example, project sponsors may be warned that their project risks being delayed or deprioritized if cost increases exceed a threshold. Also, we would find it helpful to have a better understanding of how MassDOT assesses the reasonableness of cost estimates.
- b. With the proliferation of smaller projects, the MPO has been making programming decisions earlier in the design phase (before 25% design is complete), which provides municipalities with the confidence to spend scarce resources to complete project development. However, costs can be very uncertain at this early stage, increasing the likelihood of later cost increases. Would it be possible for the MPO to do an early preliminary scoring of projects to give project sponsors an indication of how competitive the project might be, while holding the actual programming decision until the project is more well-developed and costed? Also, might it be possible to provide financial assistance with design for high-scoring projects?
- c. Can the MPO continue to look for ways to consider projects on a cost-effectiveness perspective (benefits per dollar)? This would further help the MPO and municipalities judge which projects are most likely to be programmed and worth moving through the entire design phase.
- d. Can efficiencies be found through value engineering for larger projects, such as was performed on the Green Line Extension?

The Advisory Council greatly appreciates your consideration of these comments.

Sincerely,

Lenard Diggins
Chair, Regional Transportation Advisory Council