

## **Public Comments Submitted to the Boston Region MPO**

**June 1, 2023**

The following written comments were submitted during the 21-day public comment period for the draft to the FFYs 2024-28 Transportation Improvement Program:

- **Belmont: Belmont Community Path, Belmont Component of the Mass Central Rail Trail (Phase 1) (#609204), FFYs 2024-28 TIP (page 2)**
  - o One letter in support
- **FFYs 2024-28 TIP Document, TIP Environmental Justice, Air Quality, and Climate Resilience Funding Considerations; MBTA Red-Blue Connector; MBTA Commuter Rail Electrification; MBTA Bus Garage Reconstruction at Quincy and Arborway (pages 3-22)**
  - o One letter in support, with supporting documentation
- **Norwood: Intersection Improvements at Route 1 and University Avenue/Everett Street (#605857), FFYs 2024-28 TIP (pages 23-28)**
  - o One letter in support, with supporting documentation
- **Weston: Reconstruction of Route 30 (#608954), FFYs 2024-28 TIP (pages 29-31)**
  - o One petition in opposition, with 110 signatures
- **Regional Transportation Advisory Council FFYs 2024-28 TIP Comment Letter (pages 32-33)**

May 15, 2023

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



Dear Mr. Mohler and Members of the Boston Region Metropolitan Planning Organization,

We write with continued support of the decision to program Phase 1 of the Belmont Community Path (Project ID 609204) in FY 2026 of the [Transportation Improvement Program \(TIP\) for Federal Fiscal Years \(FFYs\) 2024-28 Draft for Public Review](#). We should note that we took this decision from the Project 609204 summary page (number 77 of 240 in the PDF, 24<sup>th</sup> page in Chapter 3), even though it is not listed in Table 3-7. This project enjoys growing public support and provides many benefits, such as those described in Table A-2 and Table C-1 of the FFYs 2023-27 TIP. This path is urgently needed to close a key gap in the Massachusetts Central Rail Trail and to improve safe access to several Belmont schools via the commuter rail underpass. Thus, we encourage the MPO to program this project in an earlier fiscal year if funding opportunity and project readiness allows.

Given the importance of expanding and connecting safe, off-road paths for bicycle and pedestrian use, we affirm the inclusion of new projects in Malden and Natick (Table ES-1). We also welcome new investments in Complete Streets and Community Connections projects to make safety improvements on streets and increase mobility options with Bluebike expansion in Medford, Boston, and Cambridge. Belmont is eager for FFY 2024 Community Connections funding to provide covered bicycle parking at Chenery Middle School and promote year-round bicycling to school.

Overall, we endorse decisions in the FFYs 2024-2028 TIP that make investments in Bicycle and Pedestrian, Complete Streets, and Community Connections projects beyond the goals stated in the Long-Range Transportation Plan (LRTP), as shown in Figure ES-2. We affirm the MPO choice to increase the funding allocated to the Community Connections Program from \$2 million to \$2.5 million annually and add a Bikeshare Support Set-Aside as the MPO's overall Regional Target funding increased with the passage of the Bipartisan Infrastructure Law in 2021. Such investments should continue, and hopefully accelerate, the decreasing trend in fatalities and serious injuries of people who walk, bicycle, skate, or use wheelchairs or other mobility devices as indicated in Figure 4-5. They also increase mobility equity as Figure 6-8 shows that Bicycle Network and Pedestrian Connections projects are particularly effective in serving minority and low-income populations.

We appreciate the effort required by MPO staff to process 361 support letters for the Belmont Community Path in 2021 and list the names of everyone who signed the [2022 petition \(which closed with 748 signatures\)](#) in support of the 2022 MPO decision to fund the Belmont Community Path. We did not solicit direct input regarding Phase 1 this year, but know that public support continues to grow. Attention has shifted toward completion, with the first Public Forum for the Phase 2 project scheduled for May 18. We urge you to retain full funding for the Belmont Community Path Phase 1 when finalizing the TIP to retain momentum in closing this key gap of the Massachusetts Central Rail Trail.

Sincerely,  
Jarrod Goentzel, Chair  
Friends of the Belmont Community Path  
96 Agassiz Avenue, Belmont, MA 02478

Sara Smith, Secretary  
Friends of the Belmont Community Path  
52 Slade Street, Belmont, MA 02478

May 17, 2023

Via Email to [tip@ctps.org](mailto:tip@ctps.org), [elapointe@ctps.org](mailto:elapointe@ctps.org)

Boston Region Metropolitan Planning Organization  
Central Transportation Planning Staff  
Attn: Ethan Lapointe, TIP Manager  
State Transportation Building, 10 Park Plaza, Suite 2150  
Boston, MA 02116-3968

Subject:           Comments on Transportation Improvement Program: FFYs 2024-28

Dear Members of the Boston Region Metropolitan Planning Organization:

Conservation Law Foundation (“CLF”) and Massachusetts Sierra Club (together “commenters”) are pleased to submit these comments on the Transportation Improvement Program: FFYs 2024-28. Massachusetts Sierra Club is the state chapter of the largest, oldest, and most influential environmental grassroots organization in the country and works on climate solutions to promote clean energy, safeguard the health of our communities, protect wildlife, and preserve our remaining wild places. CLF is a nonprofit membership organization with a long history of advocating for clean and equitable transportation options for all New Englanders. In 1990, CLF and MassDOT’s predecessors signed a Memorandum of Understanding (“1990 MOU”; see Appendix 1 below) in which CLF agreed to not sue over the Big Dig, and in turn MassDOT’s predecessors agreed to finish both GLX and the Red-Blue Connector by 2010. In comments below, CLF continues to advocate for the Red-Blue Connector, as well as for more rapid progress on transit equity, electrification, and climate resilience.

Commenters reviewed the Draft Transportation Improvement Program: FFYs 2024-28 (“TIP”) and offer these comments in the spirit of constructive collaboration. Below, in more detail, we express gratitude for the advancements in equity analysis and progress toward more equitable outcomes, and urge the Metropolitan Planning Organization (“MPO”) to give more effect to the results of the analysis; express concern about the lack of progress to protect clean air and climate due to overinvestment in highways and underinvestment in public transit and electrification; urge the MPO to include funding to complete the Red-Blue Connector; and urge that any infrastructure investment be designed to be climate resilient.

1. The TIP Should Allocate More Funding to Environmental Justice Communities

Commenters celebrate the fantastic progress the MPO has made to make this goal a reality over just the last few years, with percentage of funding allocated to Transit Equity populations steadily increasing over the last several TIPs. As is shown in the analysis in Figure 6-9a, these funding decisions translate directly into improvements in air quality for those who need it most,

with reductions in air pollution for minority populations outpacing reductions in air pollution for nonminority populations for the first time in this TIP.

We also advocate that the MPO continue to raise these allocations and ratios in order to uproot the deep disparities established and entrenched over centuries, and perpetuated and defended by state transportation agencies for most of the last century. As is shown in Table 6-4, minority populations were allocated 35% of the funding in this TIP, despite representing 36.5% of the population. This is a vast improvement from even just the current TIP, which allocates 30.9% of the funding, and the MPO should seek to continue this trend so that funding allocations for minority populations exceed those for nonminority populations. To better relay the progress made on this, and in order to better assess continued progress on this goal, the MPO should provide a figure showing the ratio of per capita funding allocated to minority populations compared to per capita funding allocated to nonminority populations similar to Figure 6-9a, which shows the same for air pollution reductions.

The Boston Region MPO has an excellent equity goal in its vision statement, which is to, in part, “make investments that eliminate transportation-related disparities borne by people in disadvantaged communities.” Prioritizing investments that serve transportation equity populations, and remove or alleviate burdens on them, meaning dedicating proportionately more funding for clean transit options for environmental justice communities, will be necessary over decades to meaningfully redress the centuries of harm.

## 2. The TIP Does Not Adequately Protect Air Quality

By overinvesting in highways and underinvesting in public transit, and by continuing to make investments in fossil fuel public transit, the MPO misses an opportunity to save lives, prevent hospital visits, and generally improve the quality of life for people living and visiting the region. Commenters advocate that the TIP allocate more funding to zero-emission public transit, including expansion of the existing electric light rail system with completion of the Red-Blue Connector, procurements of electric bus and commuter rail coaches, and funding to accelerate reconstruction of the bus facility network to accommodate electric buses.

This TIP is an improvement over the previous TIP, with modeled combined emissions reductions increasing again after a reduction in the previous TIP, but it is not clear that this is part of a trend rather than a product of annual projects. In addition to showing reductions from each TIP, calculation and display of rolling cumulative reductions over the past several TIPs would be helpful in analyzing trends.

The TIP identifies, in Section 5.2.1 on air quality, a list of transportation improvement projects included in the State Implementation Plan (“SIP”), which require timely implementation. In addition to the commitments identified in the TIP—amendments to the SIP in 1979 and 1982, and the Green Line Extension—the SIP also incorporated requirements of the previously-

referenced 1990 MOU, including the Red-Blue Connector.<sup>1</sup> Completion of this critical connection in the T's all-electric rapid transit system would encourage expanded ridership and reduced reliance on polluting forms of transportation, among other benefits discussed in further detail below.

### 3. The TIP Should Fully Fund the Red-Blue Connector

If the Red-Blue Connector is not fully funded in the CIP, funding for design and construction of this high priority project should be included in the TIP. Not only is this project required by the 1990 MOU, but it also offers the potential to advance the MPO's goals, particularly clean air and sustainable communities, transportation equity, and economic vitality.

Though this TIP does not include funding to complete the Red-Blue Connector, or include it as a MassDOT required project, it is encouraging to see the Red-Blue Connector referred to as "the MBTA's major expansion program."<sup>2</sup> Previous TIPs incorrectly identified obligations related to the Red-Blue Connector as complete, though relevant commitments, specifically design and construction of the Red-Blue Connector, have not been met.

The Red-Blue Connector must be treated as a high priority by the MPO. In the late 1980s during planning for the Central Artery/Third Harbor Tunnel Project ("Big Dig"), CLF articulated air quality issues that would be ameliorated through rapid transit improvements. To meet air quality requirements pursuant to the Clean Air Act, MassDOT's predecessor agency, the Executive Office of Transportation and Construction of the Commonwealth of Massachusetts, the Massachusetts Department of Public Works, and CLF entered into the 1990 MOU to complete the Red-Blue Connector by December 2010, among other projects, all of which were determined by the signatories to result in air quality emissions reductions. Over three decades later, the need for the Red-Blue Connector remains a priority and is needed more urgently now than ever.

As the MBTA describes in the Focus 2040 report:

"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. The Red-Blue Connector adds much-needed capacity to the system, and provides access to key job centers and destinations: Logan Airport, MGH/Mass Eye and Ear, Kendall Square innovation district, plus MIT and Harvard. Access to

---

<sup>1</sup> 310 CMR 7.36(8)(a)

<sup>2</sup> Section 2.3.2

and from jobs should be a central mission for any transit agency. The Connector likewise adds access to and from housing—especially new housing coming to Suffolk Downs and elsewhere on the Blue Line. Lastly, the Connector advances 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.

#### 4. All Vehicle Procurements Should be Electric or Zero-Emission Vehicles

Commenters support 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 and trains reduces the climate impact of public transit, and will eliminate air pollution from these vehicles along their fixed routes, thus protecting the health of the drivers, riders, and people who live along the routes.<sup>3</sup> While replacing diesel buses and vans with hybrid vehicles could be seen as a step in the right direction, it would not be a wise investment. 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 goals in coming years.

Electric vehicles (“EVs”) are much cleaner than their conventional gasoline, diesel, or natural gas counterparts, including hybrids, even when accounting for power plant emissions associated with charging EVs. These vehicles offer the added benefit of becoming 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 improving local air quality.

##### a. The TIP Should Allocate Sufficient Funding for Bus Garage Reconstruction

As outlined in a report released in March by CLF and the MBTA Advisory Board, the MBTA has an exceptionally tight timeline to reconstruct the entire bus maintenance facility network and replace the entire fleet in order to meet state electrification mandates.<sup>4</sup> The TIP should allocate more funding for the MBTA’s garage reconstruction efforts in order that the MBTA not continue to experience delays like those plaguing the Quincy and Arborway garages.

As the report concluded: “By its own admission, there are significant portions of the bus electrification plan that the MBTA has not figured out, including specific timelines for most of the bus maintenance facilities and whether to incorporate in-route charging or other technologies. With so much uncertainty in the plan and considering the stakes and the MBTA’s track record for complying with mandated timelines, the MBTA must take a much more aggressive posture and build in time for new elements of the electrification plan and for unexpected delays. The MBTA must make contingencies to ensure compliance with [statutory electrification] requirements because delay isn’t a viable option. Without other alternatives, if the MBTA falls

---

<sup>3</sup> <https://keck.usc.edu/study-links-adoption-of-electric-vehicles-with-less-air-pollution-and-improved-health/>

<sup>4</sup> <https://www.clf.org/publication/mbta-bus-electrification-requirements-and-procurement-timeline/>

behind schedule and does not have facilities for sufficient electric buses to cover the system by 2040 it would have to return to the legislature to request an extension.”

b. The 100 Bi-Level Commuter Rail Coaches Should be Compatible with Electrification

Procurement of 100 bi-level commuter rail coaches should only proceed if such coaches are compatible with the MBTA’s commuter rail electrification strategy.<sup>5</sup> With electrification of the commuter rail necessary to meet state climate goals, likely over the next decade or two, investment in longer term revenue vehicles must account for longer term use scenarios. The MBTA has indicated that its preferred commuter rail electrification option is currently electric multiple units (“EMUs”), which, unlike conventional locomotives, are individually-powered coaches. Alistair Sawers, Senior Director of Rail Transformation, suggested in a public meeting on April 12, 2023 that EMUs can be configured to have a powered units alternating with unpowered units.<sup>6</sup> If the MBTA plans to electrify the commuter rail with EMUs in an every-other configuration with unpowered coaches, then that functionality should be demanded of any coach procurements going forward. If these coaches are not compatible with the MBTAs long term plans, then the TIP should not allocate this investment in outdated technology.

5. All Infrastructure Investments Should Incorporate Climate Resilience, and the TIP Scorecards Should Include a Climate Resilience Category

We are thankful that resiliency and the ability to respond to a changing climate is factored into TIP project scoring criteria, 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. To achieve this, we recommend the creation of an additional scoring goal as part of the project evaluation criteria that specifically and more meaningfully addresses climate resilience.

The existing criteria identified on the scorecards for each investment program do not include detailed enough climate resilience criteria to be of real value. Scoring a project on whether it “incorporates resiliency elements into its design” or “enhances natural environment”—which are ostensibly the only two criteria on the scorecards that address climate resilience—does not sufficiently capture the multitude of ways a project could intersect with climate resilience. A discrete climate resilience scoring category would better capture the depth needed for meaningful scoring in this regard. For example, the climate resilience goal should award points for a how well a project is designed to handle flood water (such as by incorporating pervious surfaces or elevating elements of the project) or whether it includes considerations for withstanding extreme

---

<sup>5</sup> CIP ID# P0652

<sup>6</sup> <https://www.mbta.com/events/2023-04-12/public-meeting-proposed-fy-2024-2028-capital-investment-plan-cip-meeting-virtual>

temperatures such as by incorporating shade trees. This scoring should be robust, detailed, and informed by best practices in climate resilient design.

In addition to advancing system preservation, ensuring that transportation infrastructure is climate resilient is a matter of public safety in terms of preventing failure or collapse in extreme weather events. Climate resilient transportation also advances economic vitality in that it can enable regions and communities to rebound from disasters more quickly, or provide safe and reliable routes for people to evacuate if needed. We applaud the improvements that have already been made in recent years to better incorporate climate resilience into the TIP, but there is still room for improvement.

Commenters appreciate the opportunity to weigh in on this Transportation Improvement Program. You may direct any questions to Johannes Epke at [jepke@clf.org](mailto:jepke@clf.org) and (617) 850-1761, or Veena Dharmaraj at [veena.dharmaraj@sierraclub.org](mailto:veena.dharmaraj@sierraclub.org).

Sincerely,

A handwritten signature in cursive script that reads "Johannes Epke".

Johannes Epke  
Staff Attorney  
Conservation Law Foundation  
62 Summer Street  
Boston, MA 02110  
Phone: 415-717-5049  
Email: [jepke@clf.org](mailto:jepke@clf.org)

Veena Dharmaraj  
Director of Transportation  
Massachusetts Sierra Club  
Phone: 617-423-5775  
Email: [veena.dharmaraj@sierraclub.org](mailto:veena.dharmaraj@sierraclub.org)



## **Appendix 1**

MEMORANDUM OF UNDERSTANDING:

TRAFFIC AND AIR QUALITY MITIGATION

FOR THE

CENTRAL ARTERY/THIRD HARBOR TUNNEL PROJECT

1. Parties. The parties to this agreement are the Executive Office of Transportation and Construction of the Commonwealth of Massachusetts ("EOTC"), the Massachusetts Department of Public Works ("MDPW"), and the Conservation Law Foundation ("CLF") (hereafter collectively referred to as "the parties").

2. Need for Mitigation Measures. The parties agree that:

The Central Artery/Third Harbor Tunnel Project ("the Artery/Tunnel Project") can play a major role in producing significant long-term improvements in traffic congestion and air quality;

In order to ensure these improvements in conditions, the parties acknowledge the desirability of implementing new and expanded measures to provide transportation by alternative modes and to increase the efficiency of use of the highway system that includes the Central Artery and harbor tunnels;

The 1990 amendments to the Clean Air Act impose major new requirements on Massachusetts, making it essential for the Commonwealth to position itself to meet those requirements in a manner that enhances both environmental quality and economic prosperity; and

The implementation of the measures referred to in the preceding paragraphs will contribute to the long-term success of the project under the range of conditions that may prevail in the year 2010 and thereafter.

3. Nature of Commitments in This Agreement. The commitments described in this agreement should be incorporated into the certificate of the Secretary of Environmental Affairs on the final supplemental environmental impact report ("FSEIR") for the Artery/Tunnel Project and into the record of decision for the project issued by the Federal Highway Administration ("FHWA"). The parties agree to take all steps appropriate to their respective offices, and to use their respective authorities and means to the full extent necessary, in urging that the commitments be so incorporated.

These commitments shall be incorporated in the Artery/Tunnel Project, implemented, monitored and enforced to at least the same extent as other mitigation commitments made in the environmental impact statement or report, the secretary's certificate or the record of decision for the Artery/Tunnel Project. They are intended to supplement, not to limit or substitute for, commitments made in the other documents just mentioned. The commitments described herein are intended by the parties to be fully binding and enforceable under any applicable law.

4. Parking Freezes. The MDPW has undertaken a sensitivity analysis of the traffic forecasts used to predict air quality impacts of the project. In that sensitivity analysis, several critical input variables were tested to learn their effect on traffic volumes. The results of this analysis indicate that of all the public policy interventions examined, a parking control policy would be the most effective. A full parking freeze for Boston and Cambridge would lower regional trip ends by 135,000. The parties agree that parking policy represents one of the most important areas for improved environmental control and intervention. New or revised parking freezes that ensure high levels of service (or at least no further deterioration of service) and the attainment of air quality goals without increasing street or road capacity shall be put into effect for East Boston/Revere, South Boston, Downtown Boston and Cambridge and made part of the State Implementation Plan for Massachusetts under the Clean Air Act. The parties agree to take all steps appropriate to their respective offices, using their respective authorities and means to the full extent necessary, to attain these goals.

A. Each freeze shall impose a firm limit on the total number of parking spaces in the geographical area to which the freeze applies. Each such limit shall be calculated to ensure the attainment of level of service and air quality objectives. In addition, it may be appropriate for some or all freezes to require holders of permits for new or existing spaces to establish aggressive employer-based transportation demand management programs, to provide preferences -- through set-aside, pricing, and other requirements and incentives -- for high-occupancy vehicle ("HOV") parking, and/or to provide appropriate preferences for short-term (non-commuter) parking. It may also be appropriate to issue permits on the basis of use-specific ratios of allowable parking spaces per 1000 square feet of space developed, and to vary the ratios used within different districts in a freeze area according to the districts' proximity to mass transit services.

B. The Metropolitan Planning Organization ("MPO") shall submit, in each of its parking freeze submissions to DEP, language which would require that the review and approval of additions to or changes in facilities providing parking spaces in each of the freeze areas shall be administered in accordance with a plan to be submitted to the Governor which sets forth the procedures by which the permitting of facilities in the area shall occur. In the case of the parking freezes implemented by the City of Boston, for example, these permitting procedures would be set forth as a proposed text of amendments to the current BAPCC "Procedures and Criteria for the Issuance of Parking Freeze Permits." Such procedures and criteria are subject to an open public hearing process conducted by DEP. The parties agree to take all steps appropriate to their respective offices, using their respective authorities and means to the full extent necessary, to ensure that they are effective in meeting the intent of the parking freeze.

C. Given that the MPO has, at the recommendation of the Secretary of Transportation and Construction ("Secretary"), proposed a South Boston parking freeze, the Secretary shall transmit the freeze to DEP within fourteen days from the date of this agreement. The parties shall in the ensuing months take all steps necessary to see that the South Boston parking freeze is adopted, and that the Cambridge and Downtown Boston freezes are revised, as quickly as possible in accordance with the previous paragraphs. The parties specifically agree that such revisions shall apply to all off-street spaces, and shall address the current problems created by exemption of employee spaces from the freeze concept.

5. Mass Transit. The use of mass transit by commuters, airport travelers and others in the Boston metropolitan area shall be maximized. EOTC shall complete and provide to the other parties no later than December 31, 1991, an initial study of transit improvement strategies in addition to those called for by this agreement and the FSEIR, and shall make every effort to reach a consensus with the other parties as to the conclusions and implementation of that study by March 31, 1992, at which time it should be addressed in a revised Program for Mass Transportation ("PMT"). The parties agree that all of the public transportation improvements discussed below, including rapid transit, commuter rail, bus, water shuttle and station and parking facility improvements will contribute to the success of the total transit plan. The parties also acknowledge that the implementation of other transit projects contained within the Artery/Tunnel Project, including the replacement of the Dewey Square Bus Station at South Station, the reconstruction of the

Memorandum of Understanding  
Traffic and Air Quality Mitigation  
Page 4

Airport Blue Line station, and the creation of the underground right of way for the South Boston Piers access transit project will contribute to the attainment of the Artery/Tunnel Project's environmental goals.

The parties recognize that implementation of most or all of the transit improvements addressed in this agreement is subject to public environmental review processes. If any planned improvement is found in the course of such a review process to have environmental impacts which render the project infeasible, EOTC shall develop and implement a substitute transit facility or service that will serve at least the same number of passengers in the same transportation corridor as the transit improvement contemplated by this agreement. In implementing transit improvements under this agreement, EOTC shall confer with the other parties on a quarterly basis in the manner described below.

EOTC shall also do the following.

A. All of the improvements listed in Appendix A to this agreement shall be completed. EOTC shall make every effort to complete each improvement by the last day of the calendar year stated as the year of completion in Appendix A. EOTC shall begin the operation of each new facility or service by the last day of the calendar year following the stated year of completion.

B. Although new circumferential transit facilities were not assumed in the FSEIS/R forecasts, EOTC shall determine whether and how to connect radial transit service corridors outside the central business district (provide one or more permanent circumferential transit facilities). On the basis of a feasibility study of various alternatives, EOTC shall complete and provide that study to the other parties no later than December 31, 1994, and shall make every effort to reach a consensus with the other parties as to whether and how to provide permanent circumferential transit facilities by September 30, 1995.

C. EOTC agrees to pursue with due diligence the program to attain three hour travel speeds for high speed rail between New York and Boston, as its highest inter-city transportation priority. Second, EOTC agrees to pursue high speed rail services along the inland route connecting Hartford, Springfield and Worcester to Boston. Third, EOTC agrees to work cooperatively with the States of Maine and New Hampshire to attain high speed rail service between Boston and Portland, Maine.

Fourth, EOTC agrees on the desirability of extending

Memorandum of Understanding  
Traffic and Air Quality Mitigation  
Page 5

Northeast Corridor service north of South Station, possibly on a new alignment. Toward that end, EOTC shall determine whether and how to provide a rail connection between South Station and Logan Airport on the basis of a feasibility study for such a connection. EOTC shall complete and provide that study to the other parties no later than December 31, 1991, and shall make every effort to reach a consensus with the other parties as to whether and how to provide such a connection by March 30, 1992. EOTC shall complete a preliminary study of the compatibility of planned construction work for the Artery/Tunnel Project with such a connection and provide that study to the other parties no later than February 28, 1991, and shall make every effort to carry out design and construction work for the Artery/Tunnel Project so as not to interfere with the development of a rail connection between South Station and Logan Airport.

D. Given the success of the Massport Braintree terminal project, and given the progress in establishing a multi-modal terminal in Natick, the Secretary shall make every effort to obtain from the Massachusetts Port Authority by June 30, 1991, commitments (1) to develop suburban "remote terminal" facilities designed to reduce automotive travel to Logan Airport, and (2) to expand HOV facilities and services within Logan Airport and to coordinate them with other HOV facilities and services, including those developed as part of or in connection with the Artery/Tunnel Project.

E. EOTC, in cooperation with MDPW, the Massachusetts Port Authority and the Massachusetts Turnpike Authority, shall complete and provide to the other parties by December 31, 1991, a feasibility study of the relocation of some of the existing Sumner Tunnel toll booths to a location along Route 1A, generally in the vicinity of the Airport Blue line station, that would allow for airport users to utilize separate toll booths from those approaching from other directions. Given the ability to differentiate subgroups of tunnel users, EOTC shall examine in that study the use of toll pricing to regulate trips to Logan Airport, acknowledging the needs of airport employees. EOTC shall make every effort to reach a consensus with the other parties as to how best to use toll pricing to regulate vehicle trips to the airport by March 31, 1992.

F. The parties agree that MBTA fares should be indexed so that they do not rise more rapidly than fuel, toll and other costs of automobile use, or than the rate of inflation, whichever rate of increase is lower. The parties

shall make every effort to reach a written consensus by September 30, 1991, on a specific long-term means of accomplishing such indexing to the full extent possible under existing statutes.

G. EOTC shall complete and provide to the other parties no later than September 30, 1991, a feasibility study examining alternative means of providing a water shuttle service from Boston to the North Shore, which shall explore the special problems of commuter operations in open ocean waters and make recommendations concerning strategies to deal with this problem. EOTC shall make every effort to reach a consensus with the other parties as to how best to provide such service by December 31, 1991.

6. Radial Capacity. No expansion of the radial roadways to and from Boston shall be undertaken within the Route 128 radius. Capacity shall not be expanded in either direction through the addition of lanes on any of the radial roadways, although localized improvements necessary to increase safety or to enhance HOV access may be carried out. "Radial roadway" means a roadway whose major peak-hour function is to carry passenger and other vehicles to and from Boston. This commitment shall be incorporated in the State Implementation Plan for Massachusetts under the Clean Air Act. The parties agree to take all steps appropriate to other respective offices, using their respective authorities and means to the full extent necessary, to attain such incorporation.

7. Regulation Governing Roadway Tunnel Ventilation Systems. DEP has published in draft form a proposed regulation governing roadway tunnel ventilation systems in the Boston Metropolitan Air Pollution Control District. The parties shall make every effort to assist DEP in expediting the issuance of a final regulation in order to ensure the attainment and maintenance of the air quality goals of the Artery/Tunnel Project. The parties agree that all appropriate terms of this agreement, including but not limited to those pertaining to the triggering of expanded HOV measures, should be incorporated in any compliance plan that may be submitted for the Artery/Tunnel Project (see proposed 310 CMR 7.38(5) (November 1990)). All commitments in this agreement shall be implemented and enforceable whether or not the measures to be undertaken pursuant to those commitments are also required under the DEP regulation.

8. High-Occupancy Vehicle Facilities. The highest possible level of high-occupancy vehicle ("HOV") utilization shall be attained throughout the entire highway system that includes the Central Artery and harbor tunnels, to the full extent that individual HOV facilities and priority mechanisms

Memorandum of Understanding  
Traffic and Air Quality Mitigation  
Page 7

contribute to improved environmental quality and sound traffic management. Both commuters using highways to and from Boston and travelers, patrons and employees using highways to and from Logan Airport should utilize HOVs and mass transit. Conversely, the goal of the commitments made in this memorandum is to reduce to the maximum extent feasible single-occupancy vehicle travel by those two groups and others.

To that end, the parties agree that the actions described below shall be taken. The commitments outlined in this section shall be incorporated in the State Implementation Plan for Massachusetts under the Clean Air Act. The parties agree to take all steps appropriate to their respective offices, using their respective authorities and means to the full extent necessary, to attain such incorporation.

A. Interstate 93 ("I-93") North of the Southern Bank of the Charles River.

Southbound Direction. Prior to commencement of reconstruction of the Central Artery, from the area of the I-93 Charles River bridge, the existing southbound HOV lane shall be extended toward Route 128 to the northernmost point appropriate to maximize use of the lane, using appropriate lane demarcation mechanisms. This shall not be accomplished by the addition of a new lane or lanes to I-93. The Commonwealth will incorporate into the permanent design of the Charles River crossing an HOV lane extending down the exit ramp to Nashua Street, with a head of queue enforcement point at the ramp's intersection with Nashua Street, subject to the review and approval of the FHWA. EOTC and MDPW shall further study and implement additional HOV priority measures, as appropriate, such as metering systems or HOV lanes on ramps, for southbound traffic from the Charles River crossing to Route 128.

Northbound Direction. EOTC and MDPW shall implement appropriate HOV measures if and when such measures are triggered by traffic conditions in the manner described below. In the case of this highway segment, the parties expect a left-hand HOV lane, from the Charles River crossing to the northernmost point toward Route 128 appropriate to maximize use of the lane, to be an appropriate measure. Creation of such a lane shall not be accomplished by the addition of a new lane or lanes to I-93.

B. Southeast Expressway. EOTC and MDPW shall establish an HOV lane or lanes for north- and southbound traffic, from the Interstate 90/Interstate 93 interchange to at least a point immediately north of the Route 128-Route 3



interchange, and extending beyond to the southernmost point appropriate to maximize use of the lane or lanes, prior to May 31, 1993. EOTC shall establish such a lane or lanes sooner if triggered by traffic conditions in the manner described below. The best engineering mechanism to provide faster, more reliable, safe HOV flow shall be determined through a study which EOTC shall complete and provide to the other parties no later than June 30, 1991. The study shall examine relevant engineering, safety and environmental considerations. If an HOV lane or lanes is accomplished by the addition of a new lane or lanes to I-93 or Route 3, any such HOV lane shall remain as a permanent HOV lane and shall at no point be converted to use for general traffic.

C. Massachusetts Turnpike. The Secretary shall take all steps necessary to enhance and expand the Massachusetts Turnpike Authority programs supporting HOVs and to ensure the implementation of the following measures by the Massachusetts Turnpike Authority: a program of special HOV toll booths and full head-of-queue privileges, and wherever practical, specially demarcated lanes leading to those toll booths, at all appropriate turnpike interchanges; and the provision of electronic identification systems. In addition, the Secretary shall complete and provide to the other parties no later than June 30, 1992, a study, undertaken with participation of the Authority, to establish the best mechanism to improve the quality and reliability of HOV flow on the Turnpike between Route 128 and Boston. This study shall examine the feasibility of full-scale HOV lanes and other facilities and mechanisms on the Turnpike through Newton and Boston. Once the appropriate engineering solution has been established, it shall be triggered in the manner described below. Creation of HOV lanes shall not be accomplished by the addition of a new lane or lanes to the Turnpike.

D. Trigger Mechanisms. Preceding paragraphs of this section call for HOV measures to be undertaken in the northbound direction on Interstate 93 north of Boston, and additional HOV measures to be undertaken on the Massachusetts Turnpike, when triggered by traffic conditions. Those measures shall be undertaken for the construction and post-construction period after "triggers" calculated by the parties in the following manner have been reached. Each trigger shall consist of the difference, in minutes, between a pre-construction trip time and a construction period trip time. The specific pre-construction ("baseline") trip times and thresholds ("triggers") for implementing HOV measures, both during and after construction, shall be agreed to in writing by the

parties no later than April 30, 1991. Triggers shall represent a perceptible deterioration from baseline conditions. The collection of data necessary to the determination of baseline trip times shall be undertaken by December 31, 1991.

E. Performance Standards. Performance standards shall be set for HOV trips along the entire length of each corridor referred to in this paragraph, and for trips between all important origins and destinations along each corridor. Specific performance standards shall be agreed to in writing by the parties no later than April 30, 1991. The performance standards shall be set to provide both a travel-time advantage of a sufficient amount and an extremely high level of reliability to HOVs. For example, an appropriate goal for the standards may be to maintain all HOV trip times at no more than 80 percent of non-HOV average trip time or, where adequate HOV flow now exists, at no more than 105% of current HOV average trip time. Standards shall be set, in minutes, for trips along the following corridors wherever HOV lanes or other facilities or mechanisms have been established: (1) Interstate 95-Interstate 93 interchange north of Boston and the Charles River crossing (during the construction period) and Logan Airport entrance (during the post-construction period), by way of Interstate 93 and the Callahan and Sumner Tunnels; (2) Interstate 95-Interstate 90 interchange and South Station (during the construction period) and Logan Airport entrance (during the post-construction period), by way of Interstate 90; and (3) Weymouth to South Station (during the construction period) and Logan Airport entrance (during the post-construction period), by way of the Southeast Expressway and Interstate 90.

F. Continuous Attainment of Performance Standards. Performance of HOV facilities shall be monitored on a continuous basis to determine whether additional measures or changes in HOV operations are warranted. All appropriate measures, such as metering or changes in the HOV eligibility standard, shall be used on a continual basis to the full extent necessary to maintain compliance with performance standards. Even when vehicles with two occupants do not qualify for HOV eligibility, taxis with single passengers may qualify for HOV eligibility. Trip times will be measured as described on page 5 of the construction Mitigation Appendix to the FSEIR for the project or as subsequently agreed to in writing by the parties.

G. Promotion and Enforcement for HOV System. An aggressive HOV promotion program shall be carried out by

Memorandum of Understanding  
Traffic and Air Quality Mitigation  
Page 10

EOTC according to a plan to be completed and provided to the other parties by EOTC prior to commencement of reconstruction of the Central Artery. EOTC shall make every effort to reach a consensus with the other parties as to the adequacy of the plan within ninety days from the date when the plan is submitted to the other parties. The plan will be based on a comprehensive review by EOTC, to be summarized in a written report to the other parties no later than April 30, 1991, of techniques used to manage or promote HOV use in other locations throughout the United States and Canada. Effective enforcement of the HOV system shall be provided by EOTC according to a plan to be completed and provided to the other parties by EOTC no later than the date when highway construction work begins for the Artery/Tunnel Project. EOTC shall make every effort to reach a consensus with the other parties as to the adequacy of the enforcement plan prior to December 31, 1991. EOTC shall also ensure that HOV studies targeted at the various needs of Logan Airport passengers, patrons, and employees are conducted.

H. EOTC and MDPW shall use best efforts to ensure that HOV facilities, including special bus and/or taxi lanes, are incorporated into the design, construction and reconstruction of City of Boston streets. The parties agree to consult on the progress of the development of City street designs and shall encourage the adoption of HOV lane designs wherever feasible and appropriate.

9. Mitigation Oversight. The parties agree to meet no less frequently than once in each calendar quarter, from the date of this agreement onward, to review the implementation of the commitments in this agreement and of other mitigation commitments for the Artery/Tunnel Project pertaining to traffic and air quality. The parties expect that more frequent meetings will often be necessary for the parties to confer, review studies and plans, and enter into subsequent agreements as provided in this agreement. EOTC and MDPW agree that when CLF considers additional monitoring or technical data to be necessary to carry out this agreement, EOTC and MDPW shall arrange to obtain such data in a timely and impartial manner. Such data shall be obtained through the services of an independent person or entity with relevant expertise, at the expense of EOTC and/or MDPW, where a reasonable difference of opinion exists regarding the nature or extent of the data to be obtained, the manner of data collection, or other such matters.

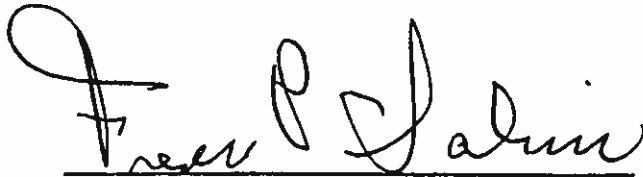
10. Future Support. In recognition of the importance of the Commonwealth's long-term commitments in this agreement to the attainment of transportation and air quality improvements, and on the condition that the commitments in this agreement are

Memorandum of Understanding  
Traffic and Air Quality Mitigation  
Page 11

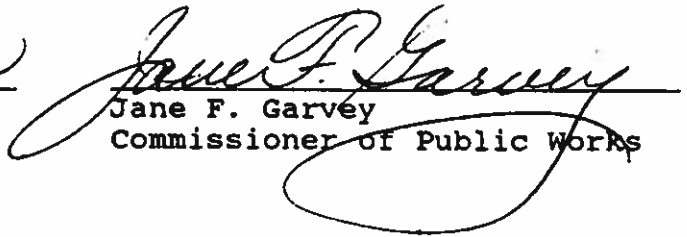
incorporated into the certificate of the Secretary of Environmental Affairs on the FSEIR and into the record of decision issued by FHWA, CLF agrees not to commence, maintain or participate in any action or legal proceeding challenging the adequacy of the environmental documentation for the Artery/Tunnel Project, including the Central Artery North Area Project. CLF specifically reserves the right to take any action necessary to enforce this Memorandum of Understanding. CLF agrees to support actively and in good faith the Artery/Tunnel Project and the implementation of the improvements and other measures undertaken pursuant to this agreement or pursuant to other mitigation commitments in the documents referred to in section 3 above, while reserving the right to recommend further improvements that can be made without delaying the project. CLF specifically agrees to pursue intervention, subject to the approval of its Board of Directors, on behalf of the Commonwealth upon request in a law suit or law suits brought against the Commonwealth in which a third party (other than a state or federal regulatory agency) challenges the adequacy of the environmental documentation for the Artery/Tunnel Project, for the purpose of asserting the public interest in the transportation and air quality improvements resulting from the Artery/Tunnel Project and the mitigation measures undertaken in connection with the project. CLF agrees to take all steps consistent with this agreement and to use its resources vigorously in carrying out the commitments

Memorandum of Understanding  
Traffic and Air Quality Mitigation  
Page 12

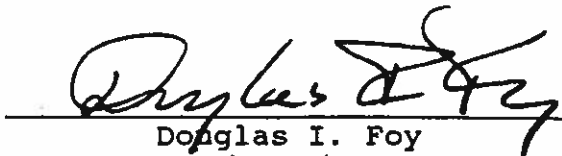
made in this paragraph.



Frederick P. Salvucci  
Secretary of Transportation  
and Construction



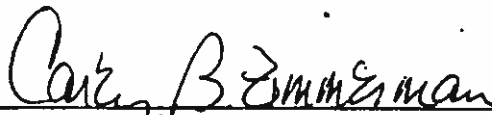
Jane F. Garvey  
Commissioner of Public Works



Douglas I. Foy  
Executive Director,  
Conservation Law Foundation

Commonwealth of Massachusetts  
Suffolk County

Sworn to and subscribed before me on this 19th day of  
December, 1990.



Carey B. Zimmerman, Notary Public  
My commission expires January 10, 1997.

Appendix A

<u>Project</u>	<u>Year of Completion</u>
<u>Commuter Rail</u>	
Old Colony Line Extension	1995
Ipswich Line Extension to Newburyport	1993
Framingham Line Extension to Worcester	1995
Lynn Central Square Station and Parking Garage	1991
North Station High Platforms New Tracks	1991
South Station Track 12	1993
<u>Rapid Transit</u>	
South Station Access to Red Line	1991
Blue Line Connection from Bowdoin Station to Red Line at Charles Station	2010
Blue Line Platform Lengthening and Modernization	1997
Green Line Extension to Ball Square/ Tufts University	2010
Green Line Arborway Restoration	1996
<u>Bus</u>	
South Station Bus Terminal	1993
Lynn Transit Station Bus Terminal	1991
South Boston Piers Electric Bus Service	2000
<u>Park &amp; Ride</u>	
Addition of 10,000 spaces systemwide, outside of Boston	1995
Addition of a further 10,000 spaces systemwide, outside of Boston	1998



***TOWN OF NORWOOD***  
***DEPARTMENT OF PUBLIC WORKS***

**One Lyman Place, Norwood, MA 02062**  
**Phone 781-762-1413 Fax 781-762-9378**  
**Email [mryan@norwoodma.gov](mailto:mryan@norwoodma.gov)**

**Mark P. Ryan**  
**Director of Public**  
**Works and**  
**Town Engineer**

---

---

May 9, 2023

Ethan Lapointe  
Transportation Improvement Program Manager  
Central Transportation Planning Staff  
10 Park Plaza, Suite 2150  
Boston, MA 02116 – 3968

RE: Norwood (605857)  
Intersection Improvements at Route 1 and University Avenue/Everett Street

Dear Ethan,

On behalf of the Town of Norwood, I respectfully submit our disappointment that the funding for the proposed intersection improvements on State Route One at University Avenue / Everett Street has been pushed to FFY 2026 and FFY 2027 per the Draft FFY 2024-2028 Transportation Improvement Program (TIP).

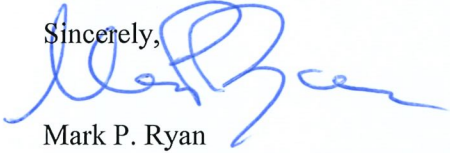
This much needed project was, at one time, positioned for funding on the FFY 2022 TIP. After discussions with MassDOT in 2021, it was understood that the complexities of the project required it to be reassigned to FFY 2025 and FFY 2026 and, we were told, that this updated program schedule was more realistic. However, we now see that the Draft FFY 2024-2028 TIP has pushed the project back to FFY 2026 and 2027.

This project is not only important to Norwood but, also to all of the commuters who utilize Route One as they travel to and from the Greater Boston area. The Town of Norwood has been advocating for this project since a 1996 CTPS Study identified the intersections deficiencies. For many years, we have worked diligently to have this project designed to improve the safety and operational deficiencies of this State controlled intersection. With the support of an Executive Office of Environmental Affairs Section 61 finding in 2008, design funding was required by the developers of the University Station project in Westwood. The project's 25% design submittal was made in November, 2016 and we are still waiting for a Design Public Hearing.

Respectfully, on behalf of the Town of Norwood, I request that the Boston MPO make every effort to urge all parties involved to make sure the project is ready for construction beginning in FFY 2026 and no later.

If you have any questions, please do not hesitate to contact me at 781-760-8341 or at [mryan@norwoodma.gov](mailto:mryan@norwoodma.gov).

Sincerely,



Mark P. Ryan  
Director of Public Works and Town Engineer

Attachments:

March 2020 letter to CTPS  
March 2021 letter to CTPS

Cc:

Norwood Board of Selectmen  
Tony Mazzucco – Norwood General Manager  
Rep. John Rogers  
Sen. Mike Rush  
Thomas O'Rourke  
File





**TOWN OF NORWOOD**  
**DEPARTMENT OF PUBLIC WORKS**

**One Lyman Place, Norwood, MA 02062**  
**Phone 781-762-1413 Fax 781-762-9378**  
**Email [mryan@norwoodma.gov](mailto:mryan@norwoodma.gov)**

**Mark P. Ryan**  
**Director of Public**  
**Works and**  
**Town Engineer**

---

---

March 23, 2020

Matt Genova  
Transportation Improvement Program Manager  
Central Transportation Planning Staff  
10 Park Plaza, Suite 2150  
Boston, MA 02116-3968

Re: Norwood (605857)  
Intersection Improvements at Route 1 and University Avenue/Everett Street

Dear Mr. Genova, 

On behalf of the Town of Norwood, I urge the Boston MPO to keep the construction funding in FFY 2022 for the proposed intersection improvements at Route 1 and University Avenue/Everett Street as shown on the 2020-2024 Transportation Improvement Program (TIP).

This project is not only important to Norwood but, also to all the commuters who utilize Route One as they travel to and from the Greater Boston area. For many years, we have worked diligently to have this project designed to improve the safety and operational deficiencies of this State controlled intersection. With the support of an Executive Office of Environmental Affairs Section 61 finding in 2008, design funding was required by the developers of the University Station project in Westwood. The project's 25% design submittal was made in November, 2016 and the Design Public Hearing is still pending.

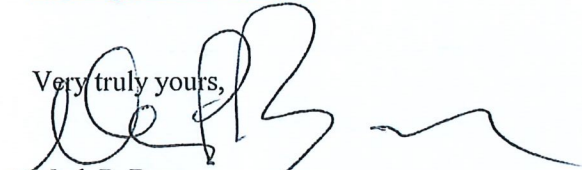
I voiced Norwood's opposition to moving the project to FFY 2023 during the virtual MPO meeting held on March 19<sup>th</sup>. As I stated during that meeting, Norwood has been advocating for this project since a 1996 CTPS Study identified the intersections deficiencies and that further delays with construction will be such a disappointment to Norwood and the commuters from the region who have suffered for so many years with this failed intersection.

It is noteworthy that out of the 15 intersection projects listed on the TIP, only one other project had a higher overall score than this project. This is clearly an indication that the improvements are warranted and that it will provide such a positive impact to the region.

Respectfully, on behalf of the Town of Norwood, I urge the Boston MPO to keep the construction funding for this project in FFY 2022.

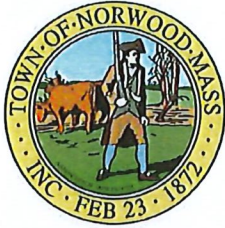
If you have any questions, please do not hesitate to contact me at 781-760-8341 or by email at [mryan@norwoodma.gov](mailto:mryan@norwoodma.gov)

Very truly yours,

A handwritten signature in black ink, appearing to read 'Mark P. Ryan', with a long horizontal flourish extending to the right.

Mark P. Ryan  
Director of Public Works and Town Engineer

Cc:  
Norwood Board of Selectmen  
Tony Mazzucco  
Rep. John Rogers  
Sen. Mike Rush  
Thomas O'Rourke  
File



***TOWN OF NORWOOD***  
***DEPARTMENT OF PUBLIC WORKS***

**One Lyman Place, Norwood, MA 02062**  
**Phone 781-762-1413 Fax 781-762-9378**  
**Email [mryan@norwoodma.gov](mailto:mryan@norwoodma.gov)**

**Mark P. Ryan**  
**Director of Public**  
**Works and**  
**Town Engineer**

---

---

March 23, 2021

Matt Genova  
Transportation Improvement Program Manager  
Central Transportation Planning Staff  
10 Park Plaza, Suite 2150  
Boston, Ma 02116-3968

RE: Norwood (605857)  
Intersection Improvements at Route 1 and University Avenue/Everett St

Dear Mr. Genova,

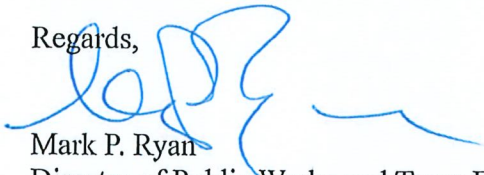
On behalf of the Town of Norwood, I urge the Boston MPO to provide construction funding in FFY 2025 and FFY 2026 for the proposed intersection improvements at Route One and University Avenue/Everett Street as shown of the Draft FFY 2022 – 2026 Transportation Improvements program (TIP).

While we are disappointed that the project could not be ready for FFY 2022, we understand the complexities involved to bring this project to readiness. After discussing the project with the MassDOT Project Manager, we are certain that this extremely important project is on a realistic schedule and will be ready for construction to commence in FFY 2025.

Respectfully, on behalf of the Town of Norwood, I urge the Boston MPO to support keeping the construction funding for this project in FFY 2025 and FFY 2026 and, for MassDOT to keep the project on schedule.

If you have any questions, please do not hesitate to contact me at 781-760-8341 or by email at [mryan@norwoodma.gov](mailto:mryan@norwoodma.gov)

Regards,



Mark P. Ryan  
Director of Public Works and Town Engineer

CC:

Norwood Board of Selectmen

Tony Mazzucco

Rep. John Rogers

Sen. Mike Rush

Thomas O'Rourke

File

May 17, 2023

Mr. Ethan Lapointe, Transportation Improvement Program Manager  
State Transportation Building  
10 Park Plaza, Suite 2150  
Boston, MA 02116-3968  
[elapointe@ctps.org](mailto:elapointe@ctps.org)  
857.702.3703

Dear Mr. Lapointe,

In accordance with the annual FFYs 2024-2028 Transportation Improvement Program (TIP) comment period, the **110 undersigned residents of Weston** would like to offer public comment and concern regarding the project #608954, the Route 30 Reconstruction project in Weston, while the 25% design plan submission is under review at MassDOT, District 6.

In consideration of the previous year FFYs 2023-2027 TIP, a letter of concern regarding the same project was signed by 36 residents and sent to the Boston MPO on May 20, 2022. That four-page letter highlighted specific detailed concerns related to the safety of the proposed shared use path, the questioning of the need for two new full traffic signals along the corridor, and the lack of meaningful and engaging public participation for the project. To date, these concerns remain unaddressed.

We note that in the current FFY 2024-2028 draft TIP the project remains in FFY 2026 for total construction funding of \$16.42 million. Since the May 20, 2022 letter, MassDOT conducted a 25% Design Public Hearing in September 2022 where numerous residents voiced the same concerns, and written feedback was simultaneously submitted to MassDOT reinforcing the crucial safety issues that a 3.7 mile two-way shared use path with 47 crossings creates. The proposed shared use path is the most costly and critical component of the entire Route 30 Reconstruction project; therefore **the undersigned residents oppose funding the project until bicycle facilities are designed for Route 30 in a way that meets AASHTO design standards, reduces or eliminates conflicts at crossings in the corridor, and most importantly, proposes that bicycle traffic travels in the same direction as vehicular traffic along both sides of Route 30 where the path crossings and intersections are most concentrated.**

The safety and highly significant related concerns that numerous residents identified in letters to the MPO in 2021 and 2022 remain unaddressed in May 2023. An alternative design solution that the most impacted residents and users of Route 30 can endorse needs to be put forward, so that the project can be supported.

The key areas of concern related to the safety of the shared use path include:

- 1. The two-way design for shared use path is unsafe** – having cyclists travelling in the westbound direction along the 3.7-mile path creates obvious safety issues at 47 crossing points – drivers will not see cyclists going the “wrong way” along the eastbound side, and cyclists heading westbound on the path won’t be aware of vehicles turning from South Avenue. This safety concern is well-documented in the current *AASHTO Guide for the Development of Bicycle Facilities*, 2012, Fourth Edition.
- 2. Too many crossings present dangers** – the majority of accidents involving cyclists occur at crossings – and the two-way traffic on the proposed shared use path greatly increases this danger. The 47 crossings on the south side of Route 30 where the path is proposed, and the number of properties (78) that will have to cross the shared use path as the only means of entering or leaving the property present a significant and unacceptable danger to users of the path and motorists crossing the **two-way** path.
- 3. The wide path encourages speed** – the proposed 10-foot-wide path is almost as wide as a travel lane on Route 30 (11 ft), which encourages users of the path to reach high speeds. The high speed creates hazards for opposing cycle/wheeled traffic, and for slower pedestrians simultaneously using the path.
- 4. Motorized bicycles and scooters are widely used and travel at high speeds** – use of electric bicycles and scooters travelling at speeds up to and above 30 mph is growing rapidly. Creating a path with these vehicles travelling in both

directions at such a high speed presents a situation where motorists will need to cross an extra “roadway” to access Route 30. This is an unacceptable safety risk and presents a highly dangerous situation for drivers, including delivery and service vehicles who are not familiar with such a path along a heavily travelled route.

5. **Loss of environmental and noise buffer** – the creation of the shared use path will involve clearing and regrading substantial areas along the south side of Route 30 – in many segments clearing all trees (large and small) and brush up to 15 feet from the edge of the roadway. Further, in some areas blasting and removing ledge that provides an important buffer between Route 30 and the Mass Pike will be required. In all, the creation of the shared use path will add nearly 4 acres of environmentally unfriendly asphalt to areas that previously provided shade and noise and visual buffering, forever changing the streetscape along this scenic roadway.
6. **Lack of equity in access and liability** – properties on the south side of Route 30 must endure significant consequences and potential liabilities of the proposed two-way path, while properties on the north side of Route 30 have difficulty accessing safe bicycle facilities. South-side property owners and corridor users entering or leaving these properties bear unacceptable risks associated with a two-way shared use path scheme.

There are several acceptable design alternatives for providing improved bicycle facilities for the Route 30 Reconstruction project. We have continuously urged the Town of Weston and the project designer, Howard Stein Hudson, to implement an alternate design, with bicycles **travelling on each side of the road, or off road in the same direction as traffic**. These alternatives offer a significantly safer design than what is currently proposed. Other hybrid alternatives, such as implementing a shared use path on segments of the corridor where crossings don’t exist, are also worthy of full consideration.

**We urge the MPO to defer funding and programming in the FFY2024-2028 TIP of the Route 30 Reconstruction project in Weston until the design of the project – in particular, bicycle facilities and other project elements – reflect safe and equitable considerations that protect the users and residents of the Route 30 corridor.**

Respectfully submitted by Weston residents,

Louis Mercuri	Rebecca Mercuri	Fernanda Bourlot	Martin Bourlot	Nina Danforth
Barbara Fullerton	Burt Fullerton	Douglas Garron	Lorna Garron	Lise Revers
Becky Ames	Barbara Baker	Nick Berardinelli	Paul Brontas	Iva Brown
Ross Brown	Sara Butera	Steven Butera	Jane Bybee	Jane Bybee
Frank Caine	Katty Chace	Tack Chace	Diana Chaplin	Gustav Christensen
Kathie Collman	Robert Collman	Paul Davenport	Will Davenport	Barry Davidson
Linda Davidson	Katherine Diver	Neil Diver	Margaret Ewald	Roxanne Ferreiro
Joyce Flaherty	Robert Froh	Gina Gagliardi	Michelle Garfinkle	Steve Garfinkle
Jennifer Garron	Barbara Gilman	Richard Gilman	Anne Grape	Sherwin Greenblat
Margaret Griner	Paul Griner	Christi Halby	John Harding	Victoria Huber
Ravi Jasuj	Angad Jasuja	Komal Jasuja	Aviva Jeruchim	James Kappel
Nancy Kappel	Guneet Kaur	Deborah Khaksari	Shahriar Khaksari	David Lau
Larine Levy	Elliot Lobel	Lenore Lobel	Nancy Lukitsh	Kate McGovern
Michael McGovern	Cody Meissner	Brad Meslin	Karen Meslin	Harold V. Meyers
Nader Michael	Nanette Michael	Natalie Michael	John Micheal	Mina-Mark Micheal
Nechatt Micheal	Lilian Mikael	Marina Mikael	Monica Mikael	Nagy Mikael
Doreen Mirley	John Mirley	Isis Morgan	Hal Myers	Mona Nakhla
Rochelle Nemrow	Jack O'Donnell	David Osborne	Joan Parrish	Bruce Paster
Hugh Pearson	Connie Pinkert	Warren Pinkert	Larry Rand	John Sallay
Susan Schaefer	Amy Silverstein	Tiina Smith	Rachael Stewart	Drew Tamoney
Richard Trant	Beverly Watson	Steve Watson	Norm Weinstock	Shelia Weinstock
Ann Wiedie	Artemis Willis	Katherine Wolfthal	Greg Zacharias	Susan Zacharias

cc: Leon Gaumont, Town Manager/Select Board, Town of Weston  
Thomas Cullen, Director of Operations, Town of Weston  
Jason Lavoie, Town Engineer, Town of Weston  
Jay Doyle, Chair, Weston Traffic and Sidewalk Committee  
John McNerney, District Highway Director, District 6, MassDOT  
Stephanie Upson, Project Manager, MassDOT  
Alice Peisch, Representative, 14<sup>th</sup> Norfolk District

Wednesday, May 17, 2023

Boston Region MPO Board  
10 Park Plaza, Suite 2150  
Boston, MA 02116

Re: Draft Federal Fiscal Years 2024-2028 Transportation Improvement Program

Dear Members of the Boston Region Metropolitan Planning Organization (MPO) Board:

The Regional Transportation Advisory Council (Advisory Council) is an independent group of citizen and regional advocacy groups, municipal officials, and agencies charged with providing public input on transportation planning and programming to the Boston Region Metropolitan Planning Organization (MPO).

The Advisory Council reviewed the MPO's Federal Fiscal Year 2024 to 2028 Transportation Improvement Program (TIP). We offer the following comments for your consideration:

- We appreciate that MPO staff have more closely involved us in the development of the TIP. Ethan Lapointe, the TIP manager, has given excellent presentations and participated in helpful question-and-answer sessions at several meetings.
- In the Executive Summary, Figure ES-3 compares the funding within the subregions of the Metropolitan Area Planning Council as to the percent of population, percent of employment, and percent of Federal Aid Roadway Miles. We think it worthwhile to discuss how this data can be better used to determine which projects receive design assistance as well as which projects are selected. We also thank you for the increasing clarity over the last few years of the six evaluation criteria and six investment programs that guide the funding decisions.
- We continue to encourage the MPO and staff to closely track how projects progress through each stage of the TIP funding process. We appreciate the MPO's decision to establish a pilot program that will help get municipalities to a design readiness of at least 25%. This could also become a more holistic assessment of the support that we provide for project design and the stage at which projects are programmed into the TIP. We are hopeful that this pilot program will succeed and become an annual support program, as we see that some municipalities are less equipped than others to bring projects to that level of design. The allocated \$4 million is a good start to what is likely to be a crucial step in the project development process. We hope this program is well-publicized and easily accessed.
- We support the MPO's recognition that there can be overlap between investment programs. For example, transit and complete streets elements can be a part of major infrastructure projects. With this recognition, projects can receive the higher scores that they deserve.. Furthermore, we emphasize that transit does not stop at town lines, RTA lines, or even MPO



lines. The Advisory Council recommends a focus on funding of better inter-regional transit connections.

- The Advisory Council would like to understand the history and policy for late-stage additions to the TIP. We encourage the MPO to have a bank of scored projects, be they MBTA or MassDOT projects, that we can evaluate by the MPO's criteria and priorities when there is a surplus of funds due to the unexpected delay of one or more projects.

- We understand that there are often large increases in the costs of projects, and we are concerned about the low level of unprogrammed money to help in these situations. Therefore, we emphasize the need for the MPO staff to keep a more watchful eye on projects as they come closer to the 100% design stage and keep the Board aware of impacts on the TIP sooner rather than later.

- We are pleased the Boston Region MPO included an annual funding stream in the TIP for state of good repair for Bikeshare in the region and support for municipalities adding bicycle infrastructure or Bikeshare expansion, including the addition of electric bikes.

- When there are successful initiatives of promising technology funded in one area of the Boston MPO Region (microtransit pilots, for example), we recommend a top-down look from the MPO at how the same service or technology could be tested in other parts of the region. Rather than being reactive, and receiving applications from parts of the region or municipalities that enjoy active local leadership at the time, we recommend that the MPO, on its own initiative, declare certain efforts as worthy of application regionally and offer technical assistance and funding of similar pilots in multiple areas. Without that regional view, planning and execution of creative efforts may be sporadic, geographically lopsided, and more difficult to scale up.

- The Advisory Council encourages the MPO to consider projects in light of climate resiliency and how their design will adapt to and/or improve the investment in that regard. Further, the MPO should even consider the long-term concept of strategic retreat/migration in the face of the continuing and worsening effects of climate change. We suggest that the MPO explore establishing stronger climate-responsive parameters. The Advisory Council would like to know where the MPO will draw the line and score repeated rehabilitation projects lower. Similar to the recent focus on transit and complete streets, we would like to see a willingness to increase points for projects that include a sustainability and climate resiliency component.

Thank you for your attention and for being great colleagues as we all strive to make transportation better for everyone in our region.

Sincerely,  
The Advisory Council