

July 12, 2023

Re: Comments on the Draft FFY24-27 LRTP

First, we readily acknowledge that during the development of this LRTP, there was the COVID-19 pandemic, and we all know how disruptive that was to everything! On top of that, there was the planned transition of LRTP development leadership from Ann McGahan to Michelle Scott fairly early on in the process and then the unplanned transition to Bradley Putnam less than a year ago. As capable as everyone is on the MPO Staff, these 2 transitions along with a significant and chronic shortage of staff have understandably made the development of this LRTP more challenging. Though this comment letter will discuss the process of developing this LRTP as well as the observations and conclusions it contains, when we emphasize any shortcomings, it's with the hope that we will be partners in the process of overcoming them.

### ***Comments on the Process***

We must commend the staff for doing an outstanding amount of outreach to develop this LRTP. The list of efforts described in Chapter #1 is impressive! Though in some respects the pandemic made outreach easier, it definitely changed the nature of the outreach, and it required nimbleness on the part of the MPO staff. To the extent that the staff was able to gather more input than anticipated, then that is a nice problem to have. To the extent that analyzing the input was hampered by being short-staffed, then we know that the MPO is doing all it can to hire the staff that it needs ASAP.

Regarding the Needs Assessment, though we appreciate the pandemic-related disruptions and a shortage of staff have allowed only for the release of the summary in Chapter 2, as of the writing on this comment letter on July 11, there are 2 concerns: (1) the originally-targeted release time is too late in the process of LRTP development to allow the Advisory Council and the MPO Board to fully review the needs and incorporate our own conclusions in the process of selecting projects and providing additional input; and (2) though using StoryMaps will allow for easier updating of the needs, we think it important for the MPO to take an "official" snapshot of the Needs Assessments so that it can serve as a basis of comparison as we attempt to determine the effectiveness of the MPO in meeting its goals. We suggest doing this by generating a PDF of all nine StoryMaps and compiling them into one document or collection.

### ***Comments on Observations and Conclusions***

In this section we will comment on each chapter of the LRTP and some of the appendices. Our comments will be far from exhaustive, but they will convey a good sense of our thoughts about this iteration of the LRTP.

Before we start, we note that there is no Table of Contents, and that made it surprisingly difficult to go back and forth while creating this comment letter. A hyperlinked Table of Contents is ideal, but even one that is not hyperlinked would be helpful. We assume that will be forthcoming in the final document and that it wasn't intentionally omitted.

### **CHAPTER 1 (Purpose of the Plan)**

- Again, the list describing the role of the public engagement process is impressive! Links from each element to the data collected and/or resulting analyses would increase transparency and would also be insightful.

### **CHAPTER 2 (Transportation Needs in the Boston Region)**

- When the StoryMaps become available, we look forward to reading the methodologies of the various data collection processes along with as much raw data as possible and a detailed explanation/presentation of the analysis.
- We continue to support the MPOs policy of integrating equity into every aspect of the determination/evaluation of needs and decision-making.
- Regarding Safety Needs, we look forward to seeing a listing of the crash clusters, especially those with high transit equity populations.
- Regarding the transit element of transit mobility, we should acknowledge that the transit operators (especially the MBTA) were dealing with operating deficits before the decrease in riders brought on by the pandemic. Though the decrease in service is understandable in light of the budgetary challenges, the elasticity values generally associated with changes in service have led to predictable results (i.e., a lower number of riders).
- Regarding the Transit-Oriented Development component of transit mobility, we want to emphasize the need for *affordable* TOD.

- Regarding access and connectivity, we think that car sharing should either be considered or reconsidered. Shared EVs and BlueBikes along with more bicycle parking could complement each other nicely.
- Regarding resiliency, though extreme heat is rightfully the dominant concern, we may find that there is also an increase in the number of extreme cold events even as our winter seasons become shorter in duration and have higher average temperatures. Our systems will need to be robust enough to handle extreme cold and perhaps more extreme snowfalls and blizzards.

### **CHAPTER 3 (Planning and Investment Framework)**

- We support the update to the planning framework, and we appreciate that economic vitality was recognized as a key component of the MPOs Access and Connectivity Goal.
- Our suggestion is that the summarization of the federal funding programs that are available to the MPO would fit better in the next chapter.

### **CHAPTER 4 (Planning and Investment Framework)**

- Though we understand the extreme difficulty in trying to select projects to fund 10+ years from now, we think that might be done more easily in the next cycle of the LRTP if we bring the UPWP to bear on doing more research to find solutions to the needs that we have assessed in this cycle and to work with municipalities to plan for projects in those outer years. Yes, long range planning is perhaps the hardest challenge that is assigned to the MPO, but our sense that we are giving up on making real commitments in those outer bands rather than making the necessary effort to meet the challenge.

### **CHAPTER FIVE (The Recommended Plan)**

- We support the overall investment program, and we emphasize here our strong support for the Complete Streets Program. We recognize that often projects can contain elements that fit into multiple goals, but we recommend that the MPO look at the cost of various elements of projects when determining how we reallocate our finding amongst our various programs. A lot of discussion went into the decision to allocate 45% of our funding to Complete Streets Program, and we should emphasize that

the reduction in funds allocated to the Complete Streets Program in the 2029-2033 time band is a deviation from our current target allocations rather a change in those targets.

- We support the FFY25 Project Design Support Pilot and we urge the MPO to select projects that are not only fit in the first 10 years of the LRTP but also to help municipalities make longer range plans that also involve cooperation with other municipalities.
- We support the evolution of the Transit Modernization Program into the Transit Transformation Program, and again, we hope that it will lead to projects that connect more than one community.
- We support the Community Connections Program, and we are pleased to see how it has developed over the last two LRTP cycles. In this cycle, we hope to see more cooperation among the entities that apply for funding.
- We are in favor of the Bikeshare Support Program, and we see it as fitting in nicely, perhaps even synergistically, with several of our other programs.
- Regarding the projects selected, we have some concerns about the low scores of the Norwood (5 out of 12 points) and Wrentham (4 out of 12 points) projects and that no score could be given to the Rutherford (Boston) project. Understandably, it is harder to score projects that have very little by the way of design, especially when they are large. It may be a good use of the MPO's time in the next year or two to review how LRTP projects are scored and how to better utilize those scores in the selection of projects.

## **CHAPTER SIX (Next Steps: Implementing Destination 2050)**

- Consistent with many of the comments that we have made, we think that coordination of the LRTP-related activities with other MPO programs is the best way to aim for our destination in 2050 and perhaps put us in a position to chart good progress to 2050 when we get to FFY 2028.

## **APPENDIX C (Public Engagement and Public Comment)**

- It is worth emphasizing yet again the extent to which we are impressed by the MPO's Public Engagement Process. The greater description of the outreach process in this appendix makes an even deeper impression.

- As in Chapter 1, we request that links be added from items listed in this appendix to relevant sections in the StoryMaps.

#### **APPENDIX D (Universe of Projects and Project Evaluations)**

- The explanation of the creation of the universe of project and the process as well as the challenges of evaluating the selected project is superb.
- Though we know that it would require more resources, we feel strongly that it would be of great benefit to evaluate more projects so that subsets of projects can be subjected to the DB/DI evaluation process. Doing so would likely give the MPO more and better options for creating a plan that creates even greater confidence that LTRP we propose is truly a superior plan.

#### **APPENDIX G (System Performance Report)**

- Given the relatively small size of the spending capacity of the MPO in comparison to that of the Commonwealth, it is understandable and sensible that we would coordinate our goals and the measurements of our performance with the MassDOT.
- We strongly support the elements listed in the "FUTURE MPO PERFORMANCE-BASED PLANNING AND PROGRAMMING ACTIVITIES." We realize this is an ambitious list and that pursuing them will be a stretch, but we encourage the staff to persevere in their efforts.

#### **APPENDIX H (Transportation Equity Performance Report)**

- We applaud the extensive and thorough nature of the equity analysis.
- We think it would be helpful if a more-detailed explanation of the results were provided in a step-by-step manner using either actual data and/or an abstracted (and very simple) example.
- The fact that the build scenario has a substantial number of negative findings is very concerning. We very much wish that there were alternative build scenarios from which we could choose. If it is at all possible for the MPO to look at other build scenarios with the intention of finding a collection of projects with fewer negative findings, we implore the MPO to do so. If time constraints prevent this, then we strongly feel that taking steps to mitigate the negative effects (which involves doing

the research to identify the causes of those effects) should be a top priority of the MPO in the upcoming FFY.

### **APPENDIX I (Disparate Impact and Disproportionate Burden Policy)**

- The effort that the MPO put into create a meaning DI/DB policy is commendable. It has created a policy that makes it accountable in a meaningful way, and though our strong comments in Appendix H may make it seem like no good deed goes unpunished, it is because we have such high standards and readily convey our shortcomings that we create a more solid foundation that will allow us to excel.

### ***Conclusion***

The conditions caused by the pandemic have presented major difficulties to the region and to all of us as individuals. Nonetheless, a lot of effort and good work has gone into creating this LRTP. As the Advisory Council to the MPO and a member of the Board, we are heavily involved with making decisions; so, the comments we make are directed at ourselves as much as they are everyone else. We feel that this LRTP needs more work, and if we can't do that work in time to meet the deadlines for FFY24, then let's commit to amending the LRTP by the end of the next FFY in order to make this LRTP a much better plan.