

REGIONAL TRANSPORTATION ADVISORY COUNCIL



July 14, 2023

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

RE: Comments on the Draft Long Range Transportation Plan (“Destination 2050”) for FFY 2024 -27

Dear Mr. Mohler,

We, the Regional Transportation Advisory Council (RTAC) for the Boston Region Metropolitan Planning Organization (MPO), also known as the "Advisory Council," herein offer our comments on the Draft FFY2024-27 Long Range Transportation Plan (LRTP). First, we readily acknowledge that during the development of this LRTP, there was the COVID-19 pandemic with its inherent disruptive effects. Also, there were three separate managers of the LRTP this cycle with the early transition planned far in advance and the later transition occurring within the last year and with much less notice. These transitions, along with a significant and chronic shortage of staff, have understandably made the development of this LRTP more challenging. This comment letter will discuss our thoughts regarding the process of developing the LRTP as well as the observations and conclusions it contains, and 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

First, we 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.

Regarding the Needs Assessment, though we appreciate that the pandemic-related disruptions and a shortage of staff have allowed for only the release of the summary of needs as presented in Chapter 2, nonetheless, we have two 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 into the process of selecting projects; 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 Assessment 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 creating this snapshot by generating a PDF of all nine StoryMaps and compiling them into one document or collection.

Comments on the 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.

CHAPTER 1 (Purpose of the Plan)

- Again, the list describing the role of the public engagement process is impressive! Links from each listed element to the data collected and/or resulting analyses would make it possible for the Advisory Council and the Board to glean additional insights, and it would create a greater sense of openness and transparency to the public.

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 transportation equity populations.
- Regarding the transit element of transit mobility, we should acknowledge that the MBTA had major operating deficits long before the decrease in riders brought on by the pandemic. Though the pandemic-related decrease in service is understandable in light of the budgetary challenges, the elasticities generally associated with changes in service levels have led to predictable results (i.e., a lower number of riders).
- Regarding the Transit-Oriented Development (TOD) component of transit mobility, we want to emphasize the need for *affordable* TOD as a large proportion of the any TOD.
- Regarding access and connectivity, we think that car-sharing should either be considered or reconsidered. BlueBikes and Shared EVs 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 transportation network also 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 more than 10 years from the present, we think that might be done more easily in the next cycle of the LRTP if: (1) we bring the UPWP to bear on doing even more research that's focused on finding solutions to the needs that we have assessed in this cycle; and (2) we work with municipalities to plan for projects in those outer years. Indeed, long range planning is perhaps the hardest challenge that is assigned to the MPO, but there is a sense that we are completely giving up on making real commitments in those outer bands rather than making the necessary effort to meet the challenges.

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 contain elements that fit into multiple goals; therefore, 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 the percentage of 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 into 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 a great complement to our other programs that try to reduce the amount travel via SOVs.
- Regarding the projects selected, even taking into account the explanation provided for moving ahead with all of the projects, we still 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 are very early in the design stage, especially when they are large. In the next year or two, we recommend that the MPO reviews how projects in the LRTP are scored and how better to utilize those scores in the selection of projects.
- We suggest that the MPO add criteria regarding the maintenance of a project as part of how a project is evaluated. This is less related to the funds available for maintenance than it is related to the design of the project and to degree to which the design makes maintenance of the project easier and/or less expensive.

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 pleased with 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 thorough and very informative.
- Though we know that it would require more resources, we feel strongly that it would be of great benefit to score more projects so that subsets of projects can undergo the DI/DB build/no-build evaluation process. Doing so would likely give the MPO more and better options for developing a plan in which we would have more confidence that it is the best (or at least better) collection of projects.

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 MassDOT.
- We strongly support the elements displayed in the "FUTURE MPO PERFORMANCE-BASED PLANNING AND PROGRAMMING ACTIVITIES" list. 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 introductory explanation of the results were provided in a step-by-step manner using either actual data or imaginary data as examples.
- 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 may involve doing the research to identify the causes of those negative effects) should be a top priority 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 regarding Appendix H may make it seem like no good deed goes unpunished, it is because we have such high standards and readily convey our own shortcomings as an MPO 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 great effort 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 would have benefitted from more deliberation by the Advisory Council and the Board on the Needs Assessment before projects were selected. We also would like to have seen more than one build scenario. Therefore, given the shortfalls of the current LRTP as indicated by the DI/DB analysis and with the clock running out for us to meet the submission deadline, let's commit to reviewing and possibly amending this LRTP by the end of the next FFY in order to make it better plan.

Respectfully,
The Advisory Council