June 11, 2015

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

RE: Draft Charting Progress to 2040: Long Range Transportation Plan
Draft Federal Fiscal Years 2016-20 Transportation Improvement
Program and Draft Federal Fiscal Year 2016 Unified Planning Work
Program

Dear Mr. Mohler:

The Regional Transportation Advisory Council (Advisory Council) is pleased to offer comments on the draft long-range transportation plan, Charting Progress to 2040 (LRTP); the Federal Fiscal Year (FFY) 2016-2020 Transportation Improvement Program (TIP); and the FFY 2016 Unified Planning Work Program (UPWP). First, the Advisory Council recognizes the effort that went into changing focus through scenario planning. The refocus of the MPO’s efforts which have been dramatic this year: The TIP changed to a five-year view (to match the LRTP years); the focus changed from large infrastructure projects to smaller, local projects. It has been a unique year of change.

**Long-Range Transportation Plan**

The MPO’s analysis of alternative LRTP scenarios illustrating different investment emphases was a valuable exercise. The Advisory Council supports adoption of the MPO’s proposed Operations and Management (O&M) scenario, rather than the alternative High-Capital Investment Congestion Management Scenario or the Current-LRTP Scenario. Under the Current LRTP and High-Cap scenarios, the majority of MPO funding over the next 25 years would have been programmed to
a small number of capital-intensive major infrastructure projects. Unfortunately, the funding available to the MPO is insufficient to do justice to the latter. The O&M scenario will instead benefit a much larger number of projects, and with them, a much larger number of communities. The emphasis on intersection improvements, “complete streets” enhancements in combination with road reconstruction, pedestrian and bicycle infrastructure, and community transportation programs will provide cost-effective safety, congestion relief, and mobility benefits throughout the region. It will also help facilitate important goals for the region and state such as mode shift, greenhouse gas reduction, sustainability, traffic safety and public health.

The Advisory Council also agrees with designating funding for general types of these smaller projects, with the specific projects (beyond the current TIP period) to be selected at a later date. The MPO’s TIP project prioritization process provides a robust approach to selecting top projects that are ready to go and have a wide array of benefits. This process will evolve over time, with the needs and priorities of the region. Smaller projects need less lead time for planning and project development. Flexibility in the plan’s funding direction will accommodate changing factors such as project readiness, funding sources, and local needs.

While supporting the direction of the LRTP (within the constraints of available funding and policy), the Advisory Council offers the following additional points for MPO consideration:

- With major infrastructure projects no longer funded through the LRTP (and inadequately funded before), and overall funding limited, we should all ask where funding for important regional projects – such as transit expansion and highway safety improvements – will come from? Once the LRTP work is complete, the Advisory Council urges the MPO to conduct further analysis of scenario(s) with additional funding beyond the projected LRTP levels, to illustrate the regional benefits that could be achieved through expanded investment in transportation.
• Planning for funds under the control of the MPO, State, and MBTA is currently conducted through separate silos. We believe that the current state of affairs does not constitute comprehensive or integrated regional planning. We urge the MPO to collaborate more closely with MassDOT and the contiguous MPOs (including MBTA & RTAS) to develop a process where priorities for major investments in the Boston region can be jointly determined.

• The Advisory Council would like to continue to provide input as the MPO develops and implements guidelines for directing funding in the categories identified in the 2021 and beyond timeframes.

Transportation Improvement Program

The proposed FFY 2016-2020 TIP implements the first five years of the LRTP with specific projects selected based on the MPO’s point system for regional goals and for project readiness. The Advisory Council believes that the MPO’s process is sound and that the recommended set of projects is reasonable. We appreciate the emphasis on prioritizing and selecting projects as objectively as possible using clearly defined criteria that relate to regional goals.

The Advisory Council observes that the number of deserving projects far outweighs the available funding. A small number of rating points separated many of them. The Advisory Council suggests that the MPO may want to undertake a sensitivity analysis of its criteria rating point systems, to see how much changes in the weighting and scoring system (e.g., emphasizing cost-effectiveness vs. total benefits) might change the outcome of project selection. The Advisory Council would also like to see the MPO continue to improve its data and analytical methods to assign ratings based on quantitative measures of impact and benefit as much as possible – realizing that it is as much art as science.

Unified Planning Work Program

We believe the proposed FFY 2016 UPWP includes a good cross-section of projects that should provide useful planning support to the region. We welcome including noise pollution in corridor and environmental justice studies. We
suggest that over time, it may be useful for the MPO to document outcomes of past UPWP projects to ensure that the studies selected for funding through the UPWP are having a meaningful impact on transportation outcomes in the Boston region.

Once again, the Advisory Council appreciates the opportunity to comment on these important planning and programming documents.

Sincerely,

Mike Gowing, Chairman
Regional Transportation Advisory Council