

June 25, 2014

Clinton Bench, Chair Boston Region Metropolitan Planning Organization 10 Park Plaza, Suite 2150 Boston, MA 02116

RE: Draft Federal Fiscal Years 2015-18 Transportation Improvement Program and Draft Federal Fiscal Year 2015 Unified Planning Work Program

Dear Mr. Bench:

The Regional Transportation Advisory Council (Advisory Council) is an independent group of citizen and regional advocacy groups, municipal representatives, and agencies charged with advising the Boston Region Metropolitan Planning Organization (MPO) on issues arising out of the federally mandated "3-C" transportation planning process and with serving as a primary mechanism for public input to the MPO within that process. We have collectively reviewed and discussed the FFYs 2015-18 Transportation Improvement Program (TIP) and the FFY15 Unified Planning Work Program (UPWP) currently in circulation for public review and comment and now offer the following input for consideration by the members of the MPO and its staff.

TIP

The Advisory Council believes the MPO should take steps each federal fiscal year to allocate sufficient funding for small and medium sized, local projects. We urge the MPO to make every effort not to let a very few large projects tie up all available target funding in the TIP program. The TIP process was set up to allow for smaller projects that can make highly needed repairs and improvements throughout the MPO region; we believe this should continue. Allowing just a few large projects to consume all available target funding (thereby decreasing funding for local projects) would change the nature of the program significantly and could discourage widespread interest in the planning process. We accordingly urge the MPO to commit to an equitable balance between small and large projects.

The Advisory Council appreciates that MassDOT occasionally fully funds projects from the Boston Region's TIP program with non-federal aid (NFA). We encourage the MPO to urge MassDOT - when considering funding projects using NFA - to select projects that have already scored highly on the MPO's project evaluation list.

Advisory Council members are concerned about the impact of project cost increases that routinely occur as projects move through the design process and closer to construction. Such cost increases significantly disrupt TIP scheduling, cause delays for other projects and prevent yet others from being programmed. We urge MassDOT to prioritize containing such cost Boston Region Metropolitan Planning Organization June 25, 2014 Page 2

increases. We urge the MPO and MassDOT to better estimate 100% design costs when projects are initially programmed (even if they may only be at 25% design at the time of their programming) and whenever scope changes are considered for approval to give serious consideration to the rippling effects that associated cost increases could have on TIP funding and scheduling.

More specifically, the Advisory Council is concerned that the Green Line Extension Phase 2 project could well have cost increases that could ultimately make the project unaffordable for the MPO. We urge all applicable state planners to consider immediately how to fund any cost increases (over the level currently programmed in the TIP) for this project and not leave the responsibility for covering any such increases solely within the MPO's purview. We further suggest that any savings from the hoped for FTA Full Funding Agreement for the Green Line Extension Phase 1 could be applied to Phase 2 expenses.

Keeping projects on schedule will minimize the inflation-related cost increases that occur when projects are delayed. Accordingly, we encourage the MPO, MassDOT and affected municipalities to work cooperatively during the design process to avoid these delays. As a helpful example, the Accelerated Bridge Program yielded significant cost savings by moving up reconstruction of important bridges (rather than spreading out to later years when the same project would have been more costly). We believe more attention to staying on schedule could similarly save the MPO significant money in the coming years.

The Advisory Council would like to see more projects programmed that improve freight mobility within and through the region. We encourage the MPO to consider how such criteria could be sensibly added to existing TIP project evaluation ratings.

Members of the Advisory Council have shared concerns that the cost of police details for construction projects in our region may be substantially higher than in other parts of the country which in turn may significantly affect the scope and number of projects that can be programmed using Target funding. We respectfully request the MPO initiate a discussion about such costs including if and how such costs might be reduced over time.

The Advisory Council is aware that the MPO is currently facing some uncertainty concerning federal target funding due to widely known concerns about the solvency of the Highway Trust Fund. Should reprioritizations regrettably prove necessary as a result of shortfalls in federal funding, the Advisory Council will look forward to participating collaboratively in such further deliberations by the MPO.

UPWP

The Advisory Council is pleased with the scope of projects recommended for the FFY2015 UPWP. We especially support studies that identify project improvements with high likelihood of implementation and those that actively generate positive interest from the private sector in bringing such projects to fruition. We are especially encouraged by the progress of the

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current Beacham Street Corridor study and see it as a potential model for further studies in the years ahead.

The Advisory Council is particularly grateful to the MPO for its continuing support of Freight Planning Support and for increasing its funding in the current UPWP. We believe that implementation of the MPO Freight Action Plan represents both a vital opportunity for economic development in and throughout the region and an effective approach toward the MPO's current freight planning needs and accordingly urge additional annual funding increases in the years ahead.

We appreciate the opportunity to express our concerns to the MPO and look forward to working collaboratively with the MPO in the months and years ahead on these and related issues.

Very truly yours,

David P. Montgomery Chair

cc: Members of the Boston Region MPO