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BOSTON REGION METROPOLITAN PLANNING ORGANIZATION

Richard A. Davey, MassDOT Secretary and CEO and MPO Chairman Karl H. Quackenbush, Executive Director, MPO Staff

January 15, 2014

Mr. David Montgomery Chair, Regional Transportation Advisory Council 10 Park Plaza, Suite 2150 Boston, Massachusetts 02116

Re: Regional Transportation Advisory Council (RTAC) Comments on Draft Federal Fiscal Year (FFY) 2014 Unified Planning Work Program (UPWP) and Draft FFYs 2014–17 Transportation Improvement Program (TIP)

Dear Mr. Montgomery:

Thank you for providing the Boston Region Metropolitan Planning Organization (MPO) with comments from the Regional Transportation Advisory Council about the region's draft FFY 2014 UPWP and draft FFYs 2014–17 TIP. Creating a forum for discussing the MPO's draft documents and providing feedback to the MPO are among the primary responsibilities of the Advisory Council; MPO members value its contributions.

The MPO considered the Advisory Council's comments as it finalized the UPWP and the TIP. MPO members also considered the comments as they reviewed a recent work product, the draft technical memorandum "Proposed Freight-Planning Action Plan for the Boston Region MPO: Meeting the Goals and Addressing the Issues." The MPO was able to address many of the concerns and ideas raised by the Advisory Council; this letter provides our detailed response.

Transportation Improvement Program

The MPO values the Advisory Council's support of its visions and policies, which as you know, serve as the foundation for the TIP criteria, evaluation, and project-rating process. Selecting projects for programming is a difficult undertaking—one which this process makes more equitable and rational.

Regarding this year's project-evaluation process, please note that project-evaluation ratings are already a primary component of MPO programming decisions. The first step in the project selection process is the staff's

development of a First-Tier List of projects, which includes the projects that have the highest ratings and that could be made ready within the time frame of the upcoming TIP. The MPO then selects projects from this list when funding allows adding new projects to the TIP. When choosing projects from the First-Tier List, the MPO staff values regionally significant projects to implement the Long-Range Transportation Plan (LRTP) and geographic equity to help ensure that the list of projects addresses needs throughout the region. Project selection must also take into account the project cost, available funding, project type, and various other factors (such as project readiness), in addition to the project rating. MPO members have discussed how much to weigh the project ratings and have concluded that, while the ratings are important, they are only one of several considerations. This year, when discussing which new projects to include in the draft TIP, members raised this issue again. The MPO discussed the proposed staff recommendation, which prioritized new funding for four relatively low-cost projects in locations around the region that had modest ratings, of 78, 71, 69, and 63, instead of funding one higher-cost, higher-rated project.

Members cited the following reasons for their decision:

- 1. This option would better distribute funds across the region.
- 2. It would implement one project commitment included in the LRTP.
- 3. It would provide more balance, as there are significant TIP-programming commitments for the Route 128 Add-a-Lane project and the Green Line Extension Phase 2 project in later years of the TIP.

During the discussion, the MPO affirmed its wish to return our focus—to the degree possible, and considering available funding—to the higher-rated (and more costly) projects on the First-Tier List during next year's programming process.

The Advisory Council's request that more weight be put on the evaluation ratings in programming decisions will be considered in the MPO's upcoming review of the TIP criteria. As a member of the MPO, the Advisory Council will have additional opportunities to deliberate this issue going forward. The MPO also will examine ways to address freight through the TIP data-collection and project-evaluation process in future reviews of the TIP criteria.

Unified Planning Work Program

MPO staff incorporated the Advisory Council's suggestion that descriptions of proposed studies in the UPWP include explanations of how study results will be

used and how recommendations will be implemented. Many of the descriptions of studies in the final UPWP demonstrate the MPO's agreement with your comment.

The MPO appreciates the Advisory Council's particular interest in studies with implementable results and recommendations. As the MPO plans the development of the FFY 2015 UPWP and updates criteria for selecting UPWP studies and specific locations for analysis, we will consider your recommendation to give priority to studies located in areas with the highest population and job density, as well as in environmental justice communities. Support for transit-oriented development and reverse communiting will also be considered as possible factors in a project's rating.

Freight

We understand and appreciate your attention to this important transportation sector and have heard the Advisory Council's strong encouragement to direct more MPO planning resources to freight transport. The MPO approved an ongoing freight program, "Freight-Planning Support," in September 2013. The FFY 2014 UPWP has funded this program at a higher level than originally proposed, showing that we support increased activity related to freight planning. The staff has developed the Freight-Planning Action Plan, which will help guide the MPO in various freight-related tasks and studies, including those identified as priorities by stakeholders. The Freight-Planning Action Plan will also keep the MPO's planning activities relevant to the MPO's area of influence and to federal requirements.

The Advisory Council's requests for studies will be considered as future freight-planning work is conceived for FFY 2014 and during development of the FFY 2015 UPWP. Some of the issues mentioned in these requests are addressed in the Freight-Planning Action Plan. Further, many corridor, subarea, and intersection studies performed by staff will continue to address issues specific to trucks on the roadways studied.

The Advisory Council requests that the MPO:

- Proactively plan for impacts caused by the increase in heavier freight and high-occupancy-vehicle traffic on Routes I-95, I-495, I-90, and connecting roads
- Create an inventory of the MPO region's multimodal freight-delivery system and of the freight needs in all modes

- Study the effects of truck-to-rail diversion, short-line railroads, increased port utilization, the effects of the Panama Canal expansion on the Boston region, and relocation of the freight rail hub to Worcester, as well as the health impacts of freight
- Coordinate the ongoing Freight-Planning Support Program with other MPOs and states

We look forward to working with the Advisory Council in the development of the FFY 2015 UPWP by more fully describing any study topics from this list that might overlap with the MPO's Freight-Planning Action Plan. We will look for study topics that may relate in some other way to the MPO's policy and programming interests, as long as they can be meaningfully studied at the regional level. In addition, the Advisory Council, as an MPO member, can continue to advocate for the ideas expressed in your comments, both at MPO meetings and at meetings of the UPWP Committee.

The Advisory Council expressed concerns about the adequacy of the MPO's regional travel demand model to address modes of freight movement other than trucking and to represent and allocate truck movements, volumes, and travel patterns in order to study and analyze truck impacts and operations. The model, like all urban travel models, is not designed to represent any freight movements other than those made by trucks within the geographic area represented by the model. It does this reasonably well; nonetheless, the MPO staff is working to enhance its performance in this regard. Very different kinds of models, using completely different structures and operating on a much larger geographic scale, are used to model long-distance, intercity freight movements made by truck, rail, water, and air. Currently, the MPO is not in possession of such a model.

The Advisory Council requested a number of other freight-related actions that will require further consideration by the MPO, including:

- Supporting adaptation of the region's ports for future conditions
- · Taking steps to reduce truck traffic and increase rail freight
- Requesting that MassDOT create a state Freight Division within MassDOT and convene a state Freight Advisory Council

Economic Development

The MPO welcomes the Advisory Council's support for the "Transportation Investments for Economic Development" study in the FFY 2014 UPWP. If there are any tasks in this study or in the freight initiatives that relate to "maritime freight and passenger demand and investment," the MPO will consider including

all Massachusetts ports. Including all ports would require demonstrating that this action is consistent with the MPO's policy and initiatives framework. The MPO, however, expects to focus its freight analyses primarily on the ports within the Boston region, and to limit its recommendations to those ports.

During the work scope development for the "Transportation Investments for Economic Development" study, the MPO will consider the Advisory Council's suggestion to seek input from the Executive Office of Housing and Economic Development and other relevant parties, as appropriate.

Public Health

The MPO also has taken note of the Advisory Council's support for building the MPO's capabilities of incorporating public health consideration in its transportation analysis and planning. The MPO currently funds staff pursuits in order to remain knowledgeable about current public health issues, and about developments and activities of other agencies in the fields of health and transportation.

MPO staff members have been working on three small projects that explore issues related to health and transportation in support of the state's Healthy Transportation Compact. This compact explores issues related to Health Impact Assessments (HIAs). In the McGrath Highway project, the staff's objective was to understand the issues and develop a methodology for HIAs that correlate travel demand model outputs with health data. In the MBTA fare increase impacts analysis project and the Metropolitan Area Planning Council's Speed Limit Reduction on Local Roads project, staff members identified and documented the air quality ramifications of various transportation alternatives, and, as a result, have gained a better understanding of health-and-transportation issues. The staff will continue to work on this topic in FFY 2014 and will consider specifying funding or proposing a new project related to transportation and health issues in the FFY 2015 UPWP.

Green-Oriented Transportation

The MPO appreciates the Advisory Council's support for the construction of transit, pedestrian, and bicycle improvements, specifically: the Green Line Extension Phase 2, Tri-Community Bikeway, South Bay Harbor Trail, Minuteman Bikeway Connection, and Assabet River Rail Trail. These investments support the statewide mode-shift goal, and we will continue to consider ways to integrate support for mode-shift activities in the TIP criteria.

The Advisory Council's request that the MPO encourage and promote local policies that make pedestrian facilities usable throughout the year to support nonmotorized transportation will require future consideration.

Conclusion

The MPO appreciates the extensive comments the Advisory Council made in its letter to the MPO about the draft UPWP and draft TIP. MPO policies and actions are, to a large extent, in line with the recommendations and views expressed by the Advisory Council. As indicated through our responses, which are elaborated above, many of the Advisory Council's requests will be considered during the development of the FFY 2015 UPWP, FFY 2015–18 TIP, and LRTP update.

The Advisory Council also made some requests that are within the purview of MassDOT. These requests, which are listed below, are under consideration by MassDOT and will be addressed going forward:

- Include freight in the Commonwealth's overall economic development strategy
- Include Massachusetts ports in studies of maritime freight and passenger demand and investment
- Increase funding for ferries and docks

Thank you for submitting your thoughtful and constructive comments. The MPO looks forward to the Advisory Council's continued involvement in the entire MPO program.

Sincerely,

Clinton Bench, Chair Boston Region MPO

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