

REGIONAL TRANSPORTATION ADVISORY COUNCIL



May xx, 2019

Re: Draft Federal Fiscal Years 2020-2024 Transportation Improvement Program

Dear Mr. Mohler,

The Regional Transportation Advisory Council (Advisory Council) is an independent group of citizen and regional advocacy groups, municipal officials, and agencies charged by the Boston Region Metropolitan Planning Organization (MPO) with providing public input on transportation planning and programming.

The Advisory Council has reviewed and discussed the draft Federal Fiscal Years (FFY) 2020-2024 Transportation Improvement Program (TIP) and offers the following comments considering both our initial review of the scored projects (March) and our review of the draft final TIP issued for public release on May 1st.

Comments on the Initial TIP Project Evaluation Reviewed in March 2019

1. We appreciate the MPO's efforts to apply and continually refine quantitative project evaluation criteria and to use the resulting scoring in prioritizing projects. We also appreciate efforts towards achieving the funding balance across project categories as proposed in the LRTP (currently no more than 50% to Major Infrastructure) and ask that these efforts continue.
2. We observe that some of the Major Infrastructure projects, notably Somerville – McGrath Blvd., Lynn – Reconstruction of Western Ave., and Boston – Comm. Ave. Improvements, are largely focused on achieving Complete Streets objectives, as contrasted with highway expansion or geometric improvements for the remaining projects. Their multimodal nature is reflected in higher scores than the remaining projects in that category. We suggest that these projects may be given somewhat different consideration within Major Infrastructure projects and should receive higher priority based on their higher scores.
3. We observe that a few projects had negative scores in some goal categories. We suggest that consideration be given to providing higher weights on negative scores, or more attention be paid to mitigation measures, under the assumption that projects should not make things worse in any major goal area (safety, environment, etc.)
4. At the evaluation stage it would be helpful to know the estimated length of time (number of years) each project will take to implement, so that reviewers can estimate the annual funding requirements for each project considered for the TIP.

Comments on the Draft Final TIP

5. We appreciate the efforts of MPO staff to continually improve the communication and understanding of the TIP process, both to the Advisory Council and with the general public. We have found that staff have been responsive to our questions. They have also made many improvements over time to how the information is presented in the TIP and supporting materials during the TIP development process.

6. We support the MPO's efforts to examine geographic equity of funding over time (as compared against population, employment, and road-miles by subregion), and believe that funding equity should continue to be a consideration in prioritizing projects. We also suggest that equity evaluation should be expanded to include the extent to which projects serve vulnerable populations.
7. We note that the MPO has been able to fund nearly all of the ready and active municipal priority projects in the next five years of the TIP. Given the large volume of perceived needs in the region, we are interested in why more projects are not being proposed and brought to readiness. We suggest that having a larger queue of ready-to-go municipal priority projects would assist in filling gaps quickly when a project needs to be removed from a TIP year, as well as ensuring that funding is going to the best/most needed projects – not just any project that is proposed and ready. We understand that MPO staff are working to understand barriers to advancement of municipal projects and encourage this effort and we also understand the challenge that it is not necessarily desirable to have a large queue of projects that are not funded from year to year and we believe staff is aware of and sensitive to those nuances.
8. We have significant concerns about the process by which the Sumner Tunnel project was brought forward to the MPO to fill a funding gap of approximately \$22 million in 2021 created by moving out the Rutherford Avenue project. The Sumner Tunnel project, while certainly an important project for the region, was not evaluated and scored in the same way that other projects were, and is not yet in the Long-Range Transportation Plan (LRTP). Furthermore, it was proposed within a few weeks of voting to release the TIP for public comment, so that there was not adequate time to answer MPO and Advisory Council questions related to timing, certainty, viability of other funding sources, and the effect on the balance of projects by type. Because of these process challenges, the Advisory Council abstained from voting for the release of the draft TIP. The shortened 21-day public comment period also provides less opportunity for public input on this change. We ask that the MPO and staff make extra effort to publicize this particular change to the TIP (since previous documents included a placeholder for MBTA modernization projects), to seriously consider the public comments that are received during this 21-day period as they are submitted in advance of voting on the final TIP, and to provide additional information regarding the above questions to the MPO and the Advisory Council before voting on the final TIP.

Once again, we appreciate the opportunity to express our thoughts to the MPO on the regional Transportation Improvement Program.

Sincerely,

Tegin Teich, Chair
Regional Transportation Advisory Council