



For a thriving New England

CLF Massachusetts 62 Summer Street
Boston MA 02110
P: 617.350.0990
F: 617.350.4030
www.clf.org

Tegin Teich, Executive Director
Betsy Harvey, Manager
Boston Region MPO CTPS
State Transportation Building
10 Park Plaza, Suite 2150
Boston, MA 02116

August 26, 2021

Via email to tteich@ctps.org and eharvey@ctps.org

Dear Ms. Teich and Ms. Harvey:

Conservation Law Foundation (“CLF”) appreciates the commitment that the Boston Region Metropolitan Planning Organization (“MPO”) and Central Transportation Planning Staff (“CTPS”) have made to evaluate and address equity issues within the Boston Region, and this opportunity to provide feedback on the Draft Boston MPO Federal Fiscal Year (“FFY”) 2021 UPWP Amendment One.¹ CLF regularly comments on Boston MPO equity analyses and programming and offers this comment in the spirit of ongoing discussion about how to best address equity concerns within the MPO region.

CLF is disappointed to see a reduction of funding dedicated to equity programming within the MPO. Project Number 8521, Transportation Equity Program, was allocated \$174,100 for FFY 2021, which is now proposed to be reduced by \$34,000 to \$140,100, due to “insufficient opportunity to spend programmed funds”.²

Inequity in distribution of benefits and burdens as a result of transportation planning is not only a historic phenomenon; we continue to see unequal and inequitable allocation of funding for low-income populations and communities of color. Those impacts and burdens are felt and suffered

¹ CLF is a non-profit, member-supported organization dedicated to protecting New England’s environment. CLF protects New England’s environment for the benefit of all people and uses the law, science, and the market to create solutions that preserve our natural resources, build healthy communities, and sustain a vibrant economy. CLF has a long history of advocating for transportation systems that are accessible, reliable, efficient, affordable, and free of air pollution and greenhouse gas emissions.

² See Table 1, page 3 of Technical Memorandum, RE: Recommended Revisions to Certain 3C Budgets (FFY2021), August 5, 2021; https://www.ctps.org/data/calendar/pdfs/2021/MPO_0805_Memo_Draft_FFY21_UPWP_Amendment_One.pdf (last accessed Aug. 26, 2021)

CONSERVATION LAW FOUNDATION

in those communities today, most notably in the forms of inferior service, infrastructure that is not resilient to a changing climate, and greater exposure to pollution, among others.

CLF is concerned that cutting the budget for the Transportation Equity Program by nearly 20 percent reduces the MPO's ability to analyze and fully understand the nature and scope of transportation equity problems within the MPO region. It is especially disappointing to see a reduction in funding due to "insufficient opportunity to spend programmed funds" because there exists no shortage of opportunities to invest in equity programming, from further analysis of the problem and potential solutions, to solicitation of input by Transportation Equity communities and ridership. This reduction rather signals a lack of priority on the Transportation Equity Program and a lack of commitment to addressing the significant equity problems that persist within the MPO region.

Thank you for your consideration of these comments, and please don't hesitate to reach out to discuss opportunities to expand equity programming in the future.

Respectfully submitted,



Johannes Epke
Staff Attorney
Conservation Law Foundation
62 Summer Street
Boston, MA 02110
Phone: 617-850-1755
Email: jepke@clf.org