

Public Comment Letters Submitted to the Boston Region MPO

July 20, 2023

The following written comment letters were submitted during the 30-day public comment period for the draft *Destination 2050* Long-Range Transportation Plan:

- **Comment Letter from Massachusetts Bay Transportation Authority (MBTA) (pages 2-3)**
- **Comment Letter from Regional Transportation Advisory Council (pages 4-8)**
- **Comment Letter from City of Newton (pages 9-10)**
- **Comment Letter from Conservation Law Foundation (pages 11-19)**
- **Comment Letter from MBTA Rider Oversight Committee (page 20)**
- **Comment Letter from LivableStreets Alliance (pages 21-23)**
- **Comment Letter from Boston resident with supporting materials (pages 24-39)**



Maura Healey, Governor
Kimberley Driscoll, Lieutenant Governor
Gina Fiandaca, Secretary & CEO
Phillip Eng, General Manager & CEO



July 7, 2023

Bradley Putnam
Long-Range Transportation Plan Manager, Central Transportation Planning Staff
10 Park Plaza Suite 2150, Boston, MA 02116

Dear Mr. Putnam,

The MBTA is pleased to congratulate MPO staff on the publication of the draft *Destination 2050* Long-Range Transportation Plan, and to offer the following comments:

- We congratulate MPO staff on the development of a new LRTP. We know it's been a challenging development cycle and applaud your hard work.
- As documented in Appendix B, MassDOT and the MBTA will be developing the next Program for Mass Transportation during FFY 2024. We anticipate strong collaboration with the MPO on the development of this important document.
- The MBTA regularly coordinates with MPO municipalities such as Somerville, Boston, Everett, Chelsea and others on transit service changes and infrastructure projects. We foresee working with MPO and MassDOT to advance key LRTP projects relevant to the MBTA, such as Rutherford Avenue, McGrath Highway, and Framingham grade separation.
- As a member of the MPO Board, the MBTA appreciates that major infrastructure projects programmed in the LRTP are often at conceptual levels of design. The project scoring and prioritization undertaken as part of TIP programming is done when capital projects are typically further along in design, and design details such as transit infrastructure, can be better planned. As major infrastructure projects are programmed for funding in subsequent TIPs, the MBTA welcomes coordination with MPO staff and municipal project proponents to design projects that improve existing transit service and infrastructure. In some cases, it will be important to consider how to future proof designs of roadways and bridges to accommodate the transit service of the future.
- The MBTA appreciates the creation of the project design support pilot for FFY 2025. While primarily aimed at municipalities, we ask that in designing and executing the pilot you include MBTA staff as early as possible, where relevant.
- The MBTA looks forward to contributing to the development of the Transit Transformation investment program as MPO staff work to define it between now and its first funding year in FFY 2029.
- The MBTA is happy to see an increased emphasis on resilience and reducing greenhouse gas emissions throughout the LRTP. Knowing that increasing transit's modal share is among the most powerful ways to reduce GHG emissions in the transportation sector, the MBTA is undertaking its own efforts on these critical topics and we hope for close coordination with MPO staff to achieve maximum alignment where possible.

- The Needs Assessment and Vision, Goals, and Objectives of Destination 2050 align with many of the priorities and investments in the MBTA's FY24-28 Capital Investment Plan – safety, accessibility, and sustainability and resiliency. The MBTA appreciates the identification of needs in the region around safe infrastructure for bicyclists and pedestrians; modernized transit infrastructure; improved transit mobility; decreased roadway congestion; promotion of TOD; connectivity in the sidewalk and bicycle networks; and adaptation of infrastructure to the impacts of climate change.
 - Related to safety and connectivity, the MBTA encourages the MPO's investments to focus on creating safe and convenient pedestrian and bicycle access to bus stops, rapid transit and commuter rail stations. In addition, the MBTA welcomes coordination with municipalities to create and maintain safe and accessible bus stops with real time transit information.
 - Related to accessibility, the MBTA encourages the MPO's investments to focus on building ADA accessible sidewalks and crosswalks along high-volume walking routes to transit stops and stations to support first and last mile connections to transit.
 - Related to climate change impacts on transit assets, the MBTA is actively conducting climate change vulnerability assessments on all of its assets to understand the range of possible impacts and develop plans for mitigation and adaptation. The MBTA will continue to coordinate with stakeholders during the planning and implementation of these vulnerability assessments and encourages the MPO's investments to continue to focus on projects that can make a meaningful impact towards shifting travel away from SOV trips and projects that consider and adapt to the impacts of climate change.
 - Related to residential development and TOD, the MBTA recognizes the national need for more affordable housing and appreciates the policies and progress made by MPO municipalities in creating zoning that allows higher density residential development and working with developers to create 'parking light' residential buildings to encourage the use of public transportation. The MBTA encourages the MPO to evaluate the impacts of new development on transit ridership, transit service levels and current infrastructure, and we would welcome participating in such evaluations in the future.

We appreciate the opportunity to comment on the draft LRTP, and the engagement of MPO staff throughout the development process. If you have any questions or would like to discuss, please contact Sandy Johnston, Deputy Director of Regional Transit Planning, at sjohnston2@mbta.com.

Sincerely,



Lynsey M. Heffernan
Assistant General Manager for Policy and Transit Planning

REGIONAL TRANSPORTATION ADVISORY COUNCIL



July 14, 2023

David Mohler, Chair
Boston Region Metropolitan Planning Organization
10 Park Plaza, Suite 4150
Boston, MA 02116

RE: Comments on the Draft Long Range Transportation Plan (“Destination 2050”) for FFY 2024 -27

Dear Mr. Mohler,

We, the Regional Transportation Advisory Council (RTAC) for the Boston Region Metropolitan Planning Organization (MPO), also known as the "Advisory Council," herein offer our comments on the Draft FFY2024-27 Long Range Transportation Plan (LRTP). First, we readily acknowledge that during the development of this LRTP, there was the COVID-19 pandemic with its inherent disruptive effects. Also, there were three separate managers of the LRTP this cycle with the early transition planned far in advance and the later transition occurring within the last year and with much less notice. These transitions, along with a significant and chronic shortage of staff, have understandably made the development of this LRTP more challenging. This comment letter will discuss our thoughts regarding the process of developing the LRTP as well as the observations and conclusions it contains, and when we emphasize any shortcomings, it's with the hope that we will be partners in the process of overcoming them.

Comments on the Process

First, we commend the staff for doing an outstanding amount of outreach to develop this LRTP. The list of efforts described in Chapter #1 is impressive! Though in some respects the pandemic made outreach easier, it definitely changed the nature of the outreach, and it required nimbleness on the part of the MPO staff.

Regarding the Needs Assessment, though we appreciate that the pandemic-related disruptions and a shortage of staff have allowed for only the release of the summary of needs as presented in Chapter 2, nonetheless, we have two concerns: (1) the originally-targeted release time is too late in the process of LRTP development to allow the Advisory Council and the MPO Board to fully review the needs and incorporate our own conclusions into the process of selecting projects; and (2) though using StoryMaps will allow for easier updating of the needs, we think it important for the MPO to take an "official" snapshot of the Needs Assessment so that it can serve as a basis of comparison as we attempt to determine the effectiveness of the MPO in meeting its goals. We suggest creating this snapshot by generating a PDF of all nine StoryMaps and compiling them into one document or collection.

Comments on the Observations and Conclusions

In this section we will comment on each chapter of the LRTP and some of the appendices. Our comments will be far from exhaustive, but they will convey a good sense of our thoughts about this iteration of the LRTP.

CHAPTER 1 (Purpose of the Plan)

- Again, the list describing the role of the public engagement process is impressive! Links from each listed element to the data collected and/or resulting analyses would make it possible for the Advisory Council and the Board to glean additional insights, and it would create a greater sense of openness and transparency to the public.

CHAPTER 2 (Transportation Needs in the Boston Region)

- When the StoryMaps become available, we look forward to reading the methodologies of the various data collection processes along with as much raw data as possible and a detailed explanation/presentation of the analysis.
- We continue to support the MPOs policy of integrating equity into every aspect of the determination/evaluation of needs and decision-making.
- Regarding Safety Needs, we look forward to seeing a listing of the crash clusters, especially those with high transportation equity populations.
- Regarding the transit element of transit mobility, we should acknowledge that the MBTA had major operating deficits long before the decrease in riders brought on by the pandemic. Though the pandemic-related decrease in service is understandable in light of the budgetary challenges, the elasticities generally associated with changes in service levels have led to predictable results (i.e., a lower number of riders).
- Regarding the Transit-Oriented Development (TOD) component of transit mobility, we want to emphasize the need for *affordable* TOD as a large proportion of the any TOD.
- Regarding access and connectivity, we think that car-sharing should either be considered or reconsidered. BlueBikes and Shared EVs along with more bicycle parking could complement each other nicely.
- Regarding resiliency, though extreme heat is rightfully the dominant concern, we may find that there is also an increase in the number of extreme cold events even as our winter seasons become shorter in duration and have higher average temperatures. Our transportation network also will need to be robust enough to handle extreme cold and perhaps more extreme snowfalls and blizzards.

CHAPTER 3 (Planning and Investment Framework)

- We support the update to the planning framework, and we appreciate that economic vitality was recognized as a key component of the MPOs Access and Connectivity Goal.
- Our suggestion is that the summarization of the federal funding programs that are available to the MPO would fit better in the next chapter.

CHAPTER 4 (Planning and Investment Framework)

- Though we understand the extreme difficulty in trying to select projects to fund more than 10 years from the present, we think that might be done more easily in the next cycle of the LRTP if: (1) we bring the UPWP to bear on doing even more research that's focused on finding solutions to the needs that we have assessed in this cycle; and (2) we work with municipalities to plan for projects in those outer years. Indeed, long range planning is perhaps the hardest challenge that is assigned to the MPO, but there is a sense that we are completely giving up on making real commitments in those outer bands rather than making the necessary effort to meet the challenges.

CHAPTER FIVE (The Recommended Plan)

- We support the overall investment program, and we emphasize here our strong support for the Complete Streets Program. We recognize that often projects contain elements that fit into multiple goals; therefore, we recommend that the MPO look at the cost of various elements of projects when determining how we reallocate our finding amongst our various programs. A lot of discussion went into the decision to allocate 45% of our funding to Complete Streets Program, and we should emphasize that the reduction in the percentage of funds allocated to the Complete Streets Program in the 2029-2033 time band is a deviation from our current target allocations rather a change in those targets.
- We support the FFY25 Project Design Support Pilot and we urge the MPO to select projects that are not only fit into the first 10 years of the LRTP but also to help municipalities make longer range plans that also involve cooperation with other municipalities.
- We support the evolution of the Transit Modernization Program into the Transit Transformation Program, and again, we hope that it will lead to projects that connect more than one community.
- We support the Community Connections Program, and we are pleased to see how it has developed over the last two LRTP cycles. In this cycle, we hope to see more cooperation among the entities that apply for funding.
- We are in favor of the Bikeshare Support Program, and we see it as a great complement to our other programs that try to reduce the amount travel via SOVs.
- Regarding the projects selected, even taking into account the explanation provided for moving ahead with all of the projects, we still have some concerns about the low scores of the Norwood (5 out of 12 points) and Wrentham (4 out of 12 points) projects and that no score could be given to the Rutherford (Boston) project. Understandably, it is harder to score projects that are very early in the design stage, especially when they are large. In the next year or two, we recommend that the MPO reviews how projects in the LRTP are scored and how better to utilize those scores in the selection of projects.
- We suggest that the MPO add criteria regarding the maintenance of a project as part of how a project is evaluated. This is less related to the funds available for maintenance than it is related to the design of the project and to degree to which the design makes maintenance of the project easier and/or less expensive.

CHAPTER SIX (Next Steps: Implementing Destination 2050)

- Consistent with many of the comments that we have made, we think that coordination of the LRTP-related activities with other MPO programs is the best way to aim for our destination in 2050 and perhaps put us in a position to chart good progress to 2050 when we get to FFY 2028.

APPENDIX C (Public Engagement and Public Comment)

- It is worth emphasizing yet again the extent to which we are pleased with the MPO's Public Engagement Process. The greater description of the outreach process in this appendix makes an even deeper impression.
- As in Chapter 1, we request that links be added from items listed in this appendix to relevant sections in the StoryMaps.

APPENDIX D (Universe of Projects and Project Evaluations)

- The explanation of the creation of the universe of project and the process as well as the challenges of evaluating the selected project is thorough and very informative.
- Though we know that it would require more resources, we feel strongly that it would be of great benefit to score more projects so that subsets of projects can undergo the DI/DB build/no-build evaluation process. Doing so would likely give the MPO more and better options for developing a plan in which we would have more confidence that it is the best (or at least better) collection of projects.

APPENDIX G (System Performance Report)

- Given the relatively small size of the spending capacity of the MPO in comparison to that of the Commonwealth, it is understandable and sensible that we would coordinate our goals and the measurements of our performance with MassDOT.
- We strongly support the elements displayed in the "FUTURE MPO PERFORMANCE-BASED PLANNING AND PROGRAMMING ACTIVITIES" list. We realize this is an ambitious list and that pursuing them will be a stretch, but we encourage the staff to persevere in their efforts.

APPENDIX H (Transportation Equity Performance Report)

- We applaud the extensive and thorough nature of the equity analysis.
- We think it would be helpful if a more-detailed introductory explanation of the results were provided in a step-by-step manner using either actual data or imaginary data as examples.
- The fact that the build scenario has a substantial number of negative findings is very concerning. We very much wish that there were alternative build scenarios from which we could choose. If it is at all possible for the MPO to look at other build scenarios with the intention of finding a collection of projects with fewer negative findings, we implore the MPO to do so. If time constraints prevent this, then we strongly feel that taking steps to mitigate the negative effects (which may involve doing the research to identify the causes of those negative effects) should be a top priority in the upcoming FFY.

APPENDIX I (Disparate Impact and Disproportionate Burden Policy)

- The effort that the MPO put into create a meaning DI/DB policy is commendable. It has created a policy that makes it accountable in a meaningful way, and though our strong comments regarding Appendix H may make it seem like no good deed goes unpunished, it is because we have such high standards and readily convey our own shortcomings as an MPO that we create a more solid

foundation that will allow us to excel.

Conclusion

The conditions caused by the pandemic have presented major difficulties to the region and to all of us as individuals. Nonetheless, a lot of great effort has gone into creating this LRTP. As the Advisory Council to the MPO and a member of the Board, we are heavily involved with making decisions; so, the comments we make are directed at ourselves as much as they are everyone else. We feel that this LRTP would have benefitted from more deliberation by the Advisory Council and the Board on the Needs Assessment before projects were selected. We also would like to have seen more than one build scenario. Therefore, given the shortfalls of the current LRTP as indicated by the DI/DB analysis and with the clock running out for us to meet the submission deadline, let's commit to reviewing and possibly amending this LRTP by the end of the next FFY in order to make it better plan.



Ruthanne Fuller
Mayor

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Barney S. Heath
Director

July 14, 2023

Tegin Teich, Executive Director
Boston Metropolitan Planning Organization
10 Park Plaza
Boston, Massachusetts 02116

Re: Long Range Transportation Plan (LRTP), Destination 2050

Dear Tegin:

Thank you for the opportunity to provide comments on behalf of the City of Newton for *Destination 2050*, the Long Range Transportation Plan for the Boston Region. The City appreciates the work that has gone in to this plan, and we note that that the criteria for referencing specific projects has changed since the previous LRTP.

In *Destination 2040*, the previous LRTP, Newton Corner was included as a Major Highway Project based on a 2009 study by the Central Transportation Planning Staff.

Because there is not currently a programmed Newton Corner project, the interchange and rotary are not included in *Destination 2050*. Subject to the outcome of current and future MassDOT planning and project development work, a future Newton Corner project should be considered for future inclusion in an amended LRTP, and/or through other MPO programs such as the Transportation Improvement Plan. It may also be proposed for federal discretionary grant programs.

Constructed in the 1960s to the detriment of the surrounding neighborhood, the Newton Corner interchange has had serious negative consequences for all who live, work and travel nearby. Its design is inadequate to current and future needs, and is hostile to people using all modes of transportation. Crash data bear this out, and the health, safety and environmental impacts of Newton Corner are well established.

In recognition of the intersection's many deficiencies, an ongoing MassDOT study (the [Newton Corner Improvements Project](#)) to develop short- and medium-term solutions is important to the surrounding neighborhood, to the City and to the region. The City is an active participant in this study with MassDOT.

We are hopeful that in partnership with MassDOT, we will advance Newton Corner to a long-term project that will be a candidate for inclusion in the LRTP.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read 'Josh Ostroff', with a long horizontal stroke extending to the right.

Josh Ostroff
Director of Transportation Planning

cc: Mayor Ruthanne Fuller
Barney Heath, Director of Planning and Development
State Senator Cynthia Creem
State Representative Kay Khan
State Representative Ruth Balsler
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July 14, 2023

Via E-mail to bputnam@ctps.org and website form

Boston Region Metropolitan Planning Organization
Central Transportation Planning Staff
Attn: Bradley Putnam, LRTP Manager
State Transportation Building, 10 Park Plaza, Suite 2150
Boston, MA 02116-3968

Subject: Comments on LRTP, Destination 2050

Dear Bradley Putnam, CTPS, and Members of the MPO Board,

Conservation Law Foundation (“CLF”) is pleased to provide the following comments on the Boston Region Metropolitan Planning Organization’s (“MPO”) draft Long Range Transportation Plan (“LRTP”) – *Destination 2050*. CLF is a nonprofit membership organization with a long history of advocating for clean and equitable transportation options for all New Englanders. After reviewing the LRTP, CLF offers comments below on (1) the equity analysis and transportation inequity in the region, (2) underinvestment in public transportation and transit electrification, and (3) the MPO’s climate resilience goal.

Before addressing the substance of the LRTP, CLF offers these comments with respect to the public process for this plan. The outreach efforts of the MPO and Central Transportation Planning Staff (“CTPS”) have been robust, and CLF appreciates the regular communication seeking input and identifying comment opportunities. One way the MPO could have improved public participation in this process is by placing this comment opportunity more prominently on the MPO website. During a recent comment period for the Unified Planning Work Program, the submission portal was at the top of the MPO’s homepage. The LRTP document and submission portal are not as immediately obvious or accessible and the MPO may receive more comments in the future by placing the current comment opportunities more prominently on the website.

Additionally, CLF would encourage the MPO to provide access to the full-length draft in languages other than English. Although the LRTP Executive Summary is provided in multiple languages, there may be information in the full-length draft that non-English speakers will not be able to access due to the language barrier. Transportation equity would be furthered by the provision of the full-length draft in multiple languages, and the LRTP will benefit from comments and suggestions for improvement from the perspective of non-English speakers.

1. The LRTP Equity Analysis is Robust but Deep Transportation Inequities in the Region Persist.

CLF commends the MPO on the Transportation Equity Performance Report that is included in the LRTP as a strong example of an equity analysis. However, the equity analysis only seeks to ensure that MPO actions do not further deepen the already considerable disparities that exist in terms of ease of access and exposure to transportation pollution based on race and wealth.

The equity analysis is rigorous, comprehensive, and progressive in its approach to addressing disparate impact and disproportionate burden (“DI/DB”). In particular, the strengths of the analysis lie in the following: the consideration of both race and income, despite only race being a federal requirement; the robust list of metrics included in the travel demand model; and the use of a zero percent disproportionality threshold. The use of a zero percent disproportionality threshold is particularly impactful – any difference in impact, burden, or benefit between nonwhite or low-income populations compared to white and non-low-income populations should be closely scrutinized so as not to perpetuate already existing systemic inequities in the transportation system and to ensure that the most transit-dependent populations are getting the service they need. CLF encourages the MPO to continue the use of this approach but makes some suggestions to further strengthen the process. Future analyses could also include mapping and analyzing populations who may not speak English well (“Limited English Proficient households” per the Census terminology) so as to fully align with the Massachusetts definition of Environmental Justice Populations and therefore provide an even more robust equity analysis.¹

Despite the progress the MPO and CTPS have made in creating a robust DI/DB policy, deep inequities from decades of underinvestment in low-income communities and communities of color will not be remedied by equality today. Transportation planning should also be conducted on the basis of improving access and the overall transportation experience for transit-dependent populations, environmental justice communities, and other marginalized groups. It is not sufficient to merely determine that benefits and impacts are evenly distributed; prioritization of allocation of money to low-income and Black and Brown communities in order to increase transportation benefits and reduce transportation burdens is needed to repair decades of systemic inequality. CLF submitted comments in October 2020 during the DI/DB Policy update urging the MPO to consider requiring that the plan not just provide equal benefits and burdens, but *equitable* benefits and burdens, prioritizing improving air quality in those neighborhoods with the worst air quality and prioritizing service improvements in neighborhoods with the worst service. Unfortunately, it is exceptionally effective to identify what neighborhoods have the worst air quality and worst transit service by looking at race and income.^{2,3}

¹ Massachusetts Environmental Justice Policy, accessed July 14, 2023, at <https://www.mass.gov/info-details/environmental-justice-populations-in-massachusetts>

² *What Does Our Equity Dashboard Reveal about Transit Access in Boston*, TransitCenter, accessed July 14 2023 at <https://transitcenter.org/what-does-our-equity-dashboard-reveal-about-transit-access-in-boston/>

³ *Racial Disparities in the Proximity to Vehicle Air Pollution in the MAPC Region*, Metropolitan Area Planning Council, accessed July 14, 2023, at <https://www.mapc.org/pollution-disparities-covid19/>

Finally, CLF notes that the DI/DB analysis section of the LRTP Executive Summary was left blank for a substantial period during this comment window.⁴ Although this was likely a technical oversight, and the DI/DB section of the Executive Summary now has text, it is essential for as much information as possible to be present throughout the entire comment window—especially since some of the public commentary may pull exclusively from the summary. As for the full-length draft, as of the submission of this comment, the DI/DB Analysis Results section near the front still says only “ADD TEXT HERE WHEN COMPLETE.”⁵ This section must be complete at the time of publishing the draft so that the public has ample time to aptly understand and comment on these drafts.

2. The Draft LRTP’s Underinvestment in Clean Public Transit is Misaligned with Massachusetts Climate Goals.

The draft LRTP’s distribution of funding to public transportation expansion and electrification relative to roads and highways is misaligned with the urgency of the climate crisis and the Commonwealth’s climate plans. Massachusetts’ Clean Energy and Climate Plan (CECP) for 2050 includes a transportation sector carbon reduction goal of 86% below 1990 levels, and recognizes that this will require both rapid electrification of the MBTA’s bus and commuter rail fleets, and expansion of the public transit system to accommodate necessary mode shift.⁶ The allocations to both public transit electrification and expansion in proposed draft LRTP are insufficient to meet the urgency of the crisis, and perpetuate the region’s dependence on fossil fuels for decades longer than certain communities or the climate can brook.

CLF recommends, below in more detail, why the LRTP should a) fund public transit at higher levels relative to roads and highways, b) anticipate vastly greater transit electrification funding needs, c) fund major public transit infrastructure expansions like the Red-Blue Connector, and d) fund more protected bicycle lanes.

a. The LRTP Overfunds Roadways and Underfunds Public Transit Service.

Of the funding allocated to MPO Investment Programs in *Destination 2050*, “Major Infrastructure” represents a major share of the budget: 30% of allocations for FY2024-28 and 2034-50, and 47% of the funding 2029-2033.⁷ Though Allston Multimodal and other projects in the category include transit and bicycle elements, the predominant focus is on improving and widening highways, reconstructing interchanges, and facilitating the continued flow of traffic in high-traffic areas. This emphasis on highway and road infrastructure projects, coupled with a complete lack of major public transit projects now that the Green Line Expansion is complete, fails to meet the urgency of the climate crisis.

⁴ The section was not literally blank, but functionally blank. Until roughly July 11th, the DI/DB analysis had only a one-line block of text indicating to add text in this spot when analysis is complete.

⁵ *Destination 2050 – Draft Long-Range Transportation Plan*, p.8, Boston Region MPO (June 2023)

⁶ Exec. Off. Energy and Env’t Affs., Massachusetts Clean Energy and Climate Plan for 2050, (2022), <https://www.mass.gov/doc/2050-clean-energy-and-climate-plan/download>

⁷ *Destination 2050 – Draft Long-Range Transportation Plan*, p.36, Boston Region MPO (June 2023)

CLF celebrates investments in safety, bicycle, pedestrian, and mobility infrastructure spread across the Complete Streets, Intersection Improvements, Bicycle Network and Pedestrian Connections, Community Connections, and Bikeshare Support programs. However, because of the nature of these investment programs, the distribution of funding between the programs does not readily reveal how much funding will ultimately go to bicycle and pedestrian infrastructure vis a vis car infrastructure. Recognizing that many projects include multiple components, CLF encourages the MPO to summarize or provide an estimate of total funding allocations by transportation mode.

Appendix G of the draft discusses the MPO’s performance-based planning and programming process, which includes federal requirements for performance goals including infrastructure condition, system reliability, safety, and environmental sustainability. These goals provide the backdrop for how MPO investments advance goals in the transportation system. This draft in its current state falls short of making as much progress as possible towards these performance goals due to overfunding in roadways and underfunding of non-SOV transit.

From the perspective of infrastructure condition and system reliability, which are MPO objectives under the mobility and reliability goal and resiliency goal, simply repairing and replacing without emphasis on alternatives will, in the long term, shorten the lifespan of roadways in good condition. Investing more in public transit options can mitigate the costs of road maintenance and repair by decreasing vehicular miles of travel (VMT). The draft includes numbers on certain intersections, mentioning that more than 100,000 vehicles travel on both I-90 and I-495 on the average day.⁸ The project description for the Allston Multimodal project appears to largely mimic the project description on MassDOT’s website, which provides some numbers for Turnpike daily travel numbers: 150,000 average daily travel vehicles east of the Allston Interchange, and the Allston Interchange Ramps average 75,000 vehicles.⁹ These numbers have undoubtedly contributed to the current condition of roads in the MPO region. Continuing to repair and expand roads without simultaneously providing necessary funding to public transit to offset SOV usage is a missed opportunity in terms of cost, equity, and meeting federal performance management requirements.

From the perspective of safety and environmental sustainability, overfunding roads and underfunding public transit is also a missed opportunity to lower fatalities, serious injuries, and emissions, all of which are performance measurements. The MPO recognizes that “[b]icyclists and pedestrians are overrepresented as people at risk for crashes”.¹⁰ 2021 saw a 40-year high of pedestrian deaths due to vehicular crashes nationwide, and 2022 saw a 41-year high—with Massachusetts seeing an increase of 21 deaths compared to 2021.¹¹ The National Highway Traffic Safety Administration estimates an 8% increase in fatal crashes for bicyclists in 2022 around the country, and a 2% increase for

⁸ *Id.* at p.40.

⁹ *About the Allston Multimodal Project*, Massachusetts Department of Transportation, accessed July 14 2023 at <https://www.mass.gov/info-details/about-the-allston-multimodal-project>

¹⁰ *Destination 2050 – Draft Long-Range Transportation Plan*, p.17, Boston Region MPO (June 2023)

¹¹ *Pedestrian Deaths Set a Four-Decade Record in 2022 (Yes, Again)*, Streetsblog, accessed on July 14 2023 at <https://usa.streetsblog.org/2023/06/22/pedestrian-deaths-set-a-four-decade-record-in-2022-yes-again>

pedestrians.¹² Moreover, there are public health risks from maintaining the same level of SOV usage. Emerging research shows that vehicles, including electric vehicles (EVs), can contribute to these non-tailpipe emissions through persistent localized particulate matter impacts from vehicle tires, even as tailpipes get cleaner.¹³ Shifting funding and focus to bike and pedestrian infrastructure would better serve to progress the MPO in achieving both the federal performance goals and its own goals of safety, public health, and resiliency. Specifically, as will be discussed further below, protected bike lanes present an opportunity to address road repair costs, reduce emissions, and promote safety.

b. Transit Transformation and Public Transportation Electrification are Significantly Underfunded.

CLF is concerned that the LRTP only allocates approximately \$250 million between now and 2050 to Transit Transformation. According to the Commonwealth's Clean Energy and Climate Plans, the transportation sector must reduce emissions 34% by 2030 and 86% by 2050 from 1990 levels.¹⁴ Given the difficulty in decarbonizing certain segments of the transportation sector, as well as electrifying personal vehicles, electrification of public transit fleets is an essential component of meeting the CECP goals. An accelerated pace of commuter rail electrification may also be legislatively imposed in coming years, with several bills introduced in the current legislative session that would require staged electrification with full system completion before 2050.¹⁵ By some estimates, electrification of the commuter rail alone could cost between \$800 million and \$1.5 billion.¹⁶ That does not include electrification of the MBTA bus fleet, which is required by statute to be completed by 2040.¹⁷

Electrification is not only essential for meeting state climate goals, but also for reductions in tailpipe emissions, particularly for those communities already overburdened by transportation pollution. Electric vehicles are much cleaner than their conventional gasoline and diesel counterparts, even when accounting for power plant emissions associated with charging EVs. These vehicles are also unique in their ability to become even cleaner as the electricity grid is increasingly powered by low- and zero-emissions power. EVs also do not emit PM or NOx from tailpipes, directly impacting local air quality.

¹² *Early Estimates of Motor Vehicle Traffic Fatalities and Fatality Rate by Sub-Categories Through June 2022*, United States Department of Transportation, National Highway Traffic Safety Administration, accessed on July 14 2023 at <https://crashstats.nhtsa.dot.gov/Api/Public/ViewPublication/813405>

¹³ *Metal contents and size distributions of brake and tire wear particles dispersed in the near-road environment*, National Center for Biotechnology Information, accessed July 14 2023 at <https://pubmed.ncbi.nlm.nih.gov/37088393/>

¹⁴ Exec. Off. Energy and Env't Affs., Massachusetts Clean Energy and Climate Plan for 2025 and 2030 (2022), <https://www.mass.gov/doc/clean-energy-and-climate-plan-for-2025-and-2030/download>; CECP for 2050

¹⁵ H.3391 An Act relative to setting deadlines to electrify the commuter rail, accessed July 14 2023 at <https://malegislature.gov/Bills/193/H3392>, and S.2217 An Act relative to setting deadlines to electrify the MBTA commuter rail, accessed July 14 2023 at <https://malegislature.gov/Bills/193/S2217>

¹⁶ *MBTA commuter rail could be electrified for between \$800 million and \$1.5 billion according to new report*, Mass Transit, accessed on July 14 2023 at <https://www.masstransitmag.com/rail/infrastructure/article/21243102/mbta-commuter-rail-could-be-electrified-for-between-800-million-and-15-billion-according-to-new-report>

¹⁷ An Act Driving Clean Energy and Offshore Wind, ch. 179, § 65, Mass. Acts (2022), <https://malegislature.gov/Laws/SessionLaws/Acts/2022/Chapter179>

c. The Region Must Invest in Major Public Transit Projects Like the Red-Blue Connector.

In addition to rapid electrification of the existing transit system, the region must also expand public transit service and induce expanded ridership. The Red-Blue Connector is one such critical infrastructure project that the Commonwealth has been putting off for decades and whose time has come. This project should be a high priority for the MPO considering the value of the project in advancing the goals of the MPO, particularly clean air and sustainable communities, transportation equity, and economic vitality. With completion of the Green Line Extension (GLX), the LRTP now includes no major investments in public transportation infrastructure. Though many of the projects funded include some transit component, or implicate a rail crossing, the major focus of the investments is on roads and highways. As well as setting electrification goals for public transit, the state's Clean Energy and Climate Plans also include significant focus on expanding public transit use, getting people out of their cars and into trains and buses and onto bikes and walking paths instead. The Red-Blue Connector would ease difficulty for passengers transferring from one line to the other, as well as ease congestion on other rapid transit lines.

The Red-Blue Connector would finish the central core of the MBTA rapid transit system, connecting the only two lines in the system that currently do not meet. Anyone traveling from anywhere on one line to anywhere on the other must transfer twice, getting on the Green Line or Orange Line for one stop downtown before transferring again. The dysfunction caused by this gap in the system is put into clear focus with the closure of the Sumner Tunnel and MassDOT's mitigation efforts to encourage people to ride the Blue Line instead. This rift also exacerbates climate chaos and inequity; suggesting that people can walk from Bowdoin to Charles/MGH is an unsatisfactory answer for people with mobility issues, or on the increasing number of days Boston experiences dangerous heatwaves or other extreme weather.

d. Protected Bike Lanes are Underfunded and Underemphasized

Regarding connection within the already-existing bicycle infrastructure, it is not enough to have a bike lane present. Currently, "Complete Streets" and "Bicycle Network Connections" bike lane expansion appears to promote bike lane construction generally, but without necessarily providing any kind of protection for the lane. Protecting the lane provides a *safe* alternative for those who might otherwise use SOV for daily transportation. An emphasis on the protection of those lanes will help maximize actual usage, thus fulfilling the goal of connecting the infrastructure to begin with. This would also further the goal of promoting safety, which, as discussed above, is an important issue for cyclists and pedestrians due to their overrepresentation in crash injuries and fatalities.

Protected bike lanes are mentioned in the draft as they relate to the increasing access to Bluebike stations (Metro Boston's bikeshare program) and providing high-quality bicycle infrastructure to increase connection across the bicycle network.¹⁸ Regarding increasing bikeshare access, current and potential cyclist commuters may have their own personal bicycle already, may not be able to afford the cost of the Bluebike program, or may take advantage of a future e-bike purchase under the Healey administration's future e-bike rebate program, such that they need access to commuting routes

¹⁸ *Destination 2050 – Draft Long-Range Transportation Plan*, p.16-7, 31. Boston Metropolitan Planning Organization (June 2023)

generally, not just to connect to Bluebike stations. This is especially important because Bikeshare support represents a mere 1% of the projected funding allocation. Should protected bike lane investment be associated with only this segment of the budget there is a risk of underfunding. None of this is to say that Bluebike expansion should not be an investment issue, especially because the density of these stations is lower in communities that the LRTP has identified as "Transportation Equity" (TE) populations.¹⁹ However, planning for bike lanes in terms of expanding Bluebikes is limited, especially because the protection of the lane itself could be construed as simply for the Bluebike stations, not broadly across the bike routes generally. Additionally, investing in protected bike lanes could increase Bluebike ridership by making the routes safer altogether.

Encouraging investment in protected bike lanes addresses other identified needs within the LRTP framework as well, ultimately acting as a means of saving costs in terms of roadway repairs, increasing safety, and reducing emissions. An emphasis area of the Clean Air and Healthy Communities section of this draft is to reduce emissions from SOVs. Listed needs include EV stations and roadway pricing. Although EVs can certainly have a non-zero impact on emissions, overemphasizing EV usage does not, on its face, address the overrepresentation of bicyclists and pedestrians as at-risk populations for MV accidents generally. It also does not adequately address the need to make roadway repairs as cost-efficient as possible by reducing SOV usage altogether, furthering the Resiliency needs identified in the LRTP.

3. Addition of the Resiliency Goal is Worth Celebrating but Does Not Go Far Enough.

We note that this year is the first time that the MPO has included Resiliency as one of the goal areas in the LRTP. While resiliency has been referenced as a consideration in the past, including it as a distinct goal area gives the matter the emphasis it deserves. CLF applauds this focus on climate resiliency. However, the current approach to incorporating resiliency into project scoring is weak and needs to be significantly more robust so as to actually reflect a project's potential to withstand climate impacts and play a part in climate adaptation.

First and foremost, CLF questions the MPO's current approach to scoring and evaluating projects for resiliency. Projects are scored based on how much of the project is within a floodplain, where "any project with no elements within a floodplain was given a low resiliency score." Projects outside of climate risk areas such as floodplains are inherently more resilient than those in risky areas. Given the long timeframe of LRTP projects, the MPO should be planning this work in places that will be comparatively safer from future climate impacts, to the greatest extent possible. While fully avoiding climate impacts isn't feasible and acknowledging that in many cases project locations are dictated by other important factors, projects that must be located within climate risk areas should be evaluated based on their potential to offset that risk. For example, projects within floodplains should be evaluated on their ability to capture, divert, or filter floodwaters. The LRTP itself identifies "nature-based strategies" as both resiliency needs identified in the MPO region and as core objectives of the Resiliency goal, but the current scoring methodology does not fully reflect this.

The LRTP must also consider a broader range of climate impacts, where the current analysis seemingly only considers flooding. While flooding is certainly a major risk to transportation

¹⁹ Bluebikes System Map, accessed July 14 2023 at <https://member.bluebikes.com/map/>

infrastructure and one that the MPO region faces, it is far from the only climate impact that is a threat to the area. The LRTP should incorporate into their evaluation procedures the impacts of extreme heat, increased precipitation and more severe storms, and more severe winter weather. For example, projects that minimize impervious surface, preserve or add shade trees, or include infrastructure such as bus shelters which can provide protection from rain and snow, should all score highly. To underscore this point, it's worth noting that the hottest days on global record were July 3-5 2023, mere days before the submission of this comment.²⁰ In communities where there is often both a lack of outside bus shelters *and* a lower relative density of trees, a heat island effect can occur where the overall health of riders is at risk—particularly for riders in TE communities.²¹ Although the LRTP recognizes that extreme heat is a trend impacting infrastructure resiliency and ridership health,²² extreme heat and severe weather do not feature in the scoring and evaluation procedures under the resiliency criteria. This evaluation criteria must expand beyond flooding.

In regards to flooding, the analysis appears to focus solely on sea level rise; the LRTP states that projects are evaluated based on “how they increase the resiliency of the region’s infrastructure to sea level rise and associated environmental challenges” and evaluates projects based on whether they are within the 100-year flood zone. This approach has the potential to severely underestimate flood risk; FEMA’s flood modelling is widely acknowledged as underrepresenting flood risk because it fails to account for projected climate impacts. This certainly applies to the MPO region; a recent MAPC study examined disaster relief claims from a March 2010 weather event and found that 96 percent of claims were for properties outside of the 100-year flood zone.²³ The LRTP should consider using an alternate data source that is based on forward-looking climate projects to evaluate flood risk, and absolutely must consider inland flooding and precipitation patterns as well as sea level risk in this analysis.

Finally, we note that of the eight major infrastructure projects evaluated for resiliency in the LRTP, only one scores “medium” for resiliency, five score “low”, and two are not scored for resiliency at all. If the LRTP is going to genuinely consider resiliency as a scoring metric, the LRTP should include and prioritize projects that score much higher in terms of their resiliency potential. The MPO is particularly well-placed to be a leader on climate resilient transportation planning, given its regional focus and long-term perspective, and the LRTP is a prime opportunity to center that goal. A transportation system that is climate resilient is a matter of effective service and public safety. We applaud the MPO on the steps it has taken thus far to address climate resiliency, but underscore that this current approach still falls short of what is needed for a truly resilient transportation system.

²⁰ *Heat Records Are Broken Around the Globe as Earth Warms, Fast*, New York Times, accessed on July 14 2023 at <https://www.nytimes.com/2023/07/06/climate/climate-change-record-heat.html>

²¹ Heat Island Effect, United States Environmental Protection Agency, accessed on July 14 2023 at <https://www.epa.gov/heatislands>

²² *Destination 2050 – Draft Long-Range Transportation Plan*, p.18, 31. Boston Metropolitan Planning Organization (June 2023)

²³ Metropolitan Area Planning Council, *Water, Water, Everywhere: The Increasing Threat of Stormwater Flooding in Greater Boston*, May 2023, accessed July 14 2023 at <https://www.mapc.org/wp-content/uploads/2023/05/Stormwater-ReportFINAL.pdf>

Thank you for the opportunity to comment. Please reach out by phone or email with any questions or to discuss these comments.

Sincerely,



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they/he
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MBTA Rider Oversight Committee

July 16, 2023

To: The Boston Region Metropolitan Planning Organization (MPO)
RE: Destination 2050, the Long-Range Transportation Plan

The MBTA Rider Oversight Committee (the “MBTA ROC”) respectfully submits this letter to express our support for the MPO’s FFY 2023-27 Long-Range Transportation Plan. Since this is a regional plan, it is fitting that it should be comprehensive with attention paid to all modes of mobility.

In particular, we are very pleased to see that the Transit Modernization Program will become the Transit Transformation Program. Even with a small sum a money, a carefully chosen project can have a large effect on how riders use transit and how they feel about the prospects of using transit. For example, the various apps and countdown clocks have transformed the way that we use the T and how we feel about it.

Even though the Bikeshare Support Program won’t go into effect until FFY2029, we support the creation of this new program. We think that increasing access to bikes will likely increase the use of transit, and if not, then removing cars from the road will be good for the environment and perhaps reduce congestion. For similar reasons, we support the continued funding of the Bicycle Network and Pedestrian Connections Program as well as the Community Connections Program.

We are grateful for this opportunity to make comments and for the many other opportunities to provide input. We look forward the implementation of this plan and the prospect of working more with the MPO.

Sincerely,

The MBTA Rider Oversight Committee

MPO 2050 Comments

Disparate Impact and Disproportionate Burden Policy (Pg. 194)

- Definitions of DI and DB, feel technical.
 - The sentence “(Although EJ guidance covers minority populations as well, disproportionate burdens only refer to those impacts to low-income populations as minority populations are covered by the more stringent definition of a disparate impact.)” helps to clarify, but could be written in simpler language.
 - DI – only looks at racialized populations and....
 - DB - only look at low-income and....
 - ^ something like that
- Pg. 195 - ; “individual projects are not analyzed for disparate impacts or disproportionate burdens under this policy. “ —> why?
 - I think you get to this in the “comparison populations” section, but perhaps worth stating above
- If the DI /DB analysis is done regionally, how are you able to tell which project in the group creates the most issues or should be the focus of change?
- Pg. 190 / general – the sentences “. The results of the environmental metrics. environmental metrics for the MPO Regional Target projects show no DI/DB findings for any of the four metrics. The MPO Regional Target projects would likely result in an increase for congested VMT per square mile for non-minority and non-low-income populations, and no impact for any other populations or metrics. As a result, there are no findings of disproportionate impacts or disproportionate burdens...” are helpful because they tell me what I should be taking away / the conclusion, but it would be easier to read if those were bolded or in a colored box.
 - I see there is a “conclusions and next steps” that does this too, but would still be good to make super clear in other sections of the report.
- Pg. 178 – Destination Access Metrics
 - Why is it 45 mins to parks?
 - Seems very unlikely people will commute for 45 mins to get to a park
 - Use Trust for Public Land’s goal of 10 mins to an open space? 25 mins, still seems far, but more reasonable / in line with other funding metrics in that category

Funding

- *Page 6 table*

program priority funding and is also not within the fiscal constraint of the plan.

**Table ES-2
Recommended Plan Projects**

Project Name	Current Estimated Cost	Time Bands	Within Fiscal Constraint?
Boston: Allston Multimodal	\$675,500,000	2024-28	No
Hopkinton: I-495 and I-90 Interchange	\$300,942,836	2024-28	No
Boston: Reconstruction of Rutherford Avenue from City Square to Sullivan Square	\$197,759,449	2024-33	Yes
Framingham: Intersection Improvements at Route 126 and Route 135/MBTA and CSX Railroad	\$115,000,000	2029-33	Yes
Lexington: Route 4/225 (Bedford Street) and Hartwell Avenue	\$45,000,000	2029-33	Yes
Norwood: Intersection Improvements at Route 1 and University Avenue/Everett Street	\$28,699,272	2024-28	Yes
Somerville: McGrath Boulevard	\$98,840,000	2024-33	Yes
Wrentham: I-495/Route 1A Ramps	\$20,117,638	2024-28	Yes

Note: Years are federal fiscal years.
Source: Boston Region Metropolitan Planning Organization.

- The first example is for illustration purposes but the second confuses me- since it is not within the time constraints?
- Page 28: I think this would be a good place to show the list of projects between FFYs 2024 and 2033. For FFYs 2034 to 2050, the investment projects for some clarity. I personally find it confusing how the two differ- Maybe have a graphic showing what these two sets of projects mean. This obviously depends on your target audience- would they know the difference?
- Page 28: *The dollars allocated in the LRTP to projects and investment programs must remain within the limit of available funding. As such, Destination 2050 and the TIP must demonstrate that projects selected by the MPO can be implemented within fiscal constraints* Do you take this into account when you a lot the funds for different projects? (if they already have funds available through other resources)
- Page 29: The decision process might look better as a graphic-with timeline and who is involved at what point.

Public Outreach

- Destination 2050 Planning Framework Engagement (pg 79)
 - Recommend creating a chart of specific themes of feedback that were used to edit the plan. For example:

Feedback from the public	Edits made to plan
"The plan needs to focus on equity more".	"Equity objectives were integrated into XYZ (listed) goal areas of the plan"

- Average Funding Allocation Responses from Investment Programs Survey (graph) pg. 84
 - Recommend converting into a chart. It is clearer to read and offers less interpretation of the information.

Transportation Equity Performance Report

- Please elaborate on what minority means in this context. Pg 173

- *Recommend using another color to represent minority populations other than brown (lol) pg. 175*

Other / Additional

- Would like to see the inclusion of greenways in the way the MPO thinks about transit, bicycle / pedestrian connections, transit transformations, and community connections (intro to Chapter 5).
 - Creating more greenways, bioswales, green barriers, rain gardens, and permeable pavement or even funding them within Complete Street, intersection, multimodal, etc plans should be a focus for TIP projects and the MPO.
 - This plan could be much more forward thinking on definitions of transit terms (like changing “bike lane” to “multimodal lane” to anticipate future trends in transportation. Chances are scooters, blades, and other non-car transportation methods will be much more common in 2050).
- This report is highly technical and difficult to follow (specifically the DI/DB section). Curious who the audience is – if it’s the general population, advocates, or even non transportation planners, it is difficult to understand.
 - Depending on the audience a shift from using graphs to charts may be more helpful for the general public to understand.
- There is a huge focus in the beginning of the report over the equity/minority/underserved populations/Safety/climate resilience- when you mention the projects in chapter 5- the descriptions are just focused on the connectivity/transit aspect without highlighting the significance of said project in terms of these other aspects.

High Level

- Love to see equity as a high level goal / framing
- pg . 5 – under objectives for mobility, there is no talk of building more regional transit. Increasing reliability and safety is huge, but so is expanding the network (maybe this is inferred from the objectives listed under “access + connectivity?”)
- Pg. 6 – under objectives for “resiliency,” great to see the last bullet point talk about nature based solutions! Can we use the term “greenways,” or add additional language about linking greenways to transit connections?
- The reconstruction of Rutherford Ave in Boston is a great project! Excited to see that on here.
- Want to clarify that the plan includes Allston Multi-Modal because it’s anticipated to be a giant project in the region worthy of note, but that the MPO doesn’t plan to allocate money to it? I’m a bit confused by that part...
 - ...perhaps are you saying there could be MPO money for it in the future?

MPO Statement

If you weren't aware, both Everett as well as Charlestown are both about to go through some serious growth!

Both will have a problem getting people into and through our current road spaces by personal vehicles as well as any bus solution at the expected need.

Frankly, we already went down this path once before with the MPO when Everett tried to get the Orange Line extension, which was even designed into the lines replacement when the EI was taking down moving the pathway of the Orange line into its current pathway today.

We now need that Orange line extension to serve Everetts new growth of both a stadium and the repurpose of the Exxon tank farm into housing and new business space that is expected to take its place.

This growth can't spill into Charlestown via Rt99 as our community will be suffering the effects of the massive flood of traffic along this pathway just with our own growth within the current buildout of the Bunker Hill Housing Redevelopment Project which will already exceeds the limits we have getting across Rutherford Ave (Rt99).

You see Charlestown only has three egress pathways across Rutherford Ave and onwards, and all three are shared with 16 & 99 traffic which is also coming through us!

The now stalled out 2019 Rutherford Ave design needs to be applied without any alteration from what was show to us! And no the Silver Line has no place here either as its too big physically adding hardship for us getting across and doesn't offer the needed volume when the stadium attendance requires more transit without harming Charlestown.

Instead the Orange line needs to be extended across the Mystic River and serve the stadium and new development of the Everett area.

You can't destroy one community for another!

Sometimes big investments are needed! Lets get the second rail bridge built with the multi-use pathway connecting the Northern Strand multi-use pathway. Sadly, some of the just now completed path will need to be altered a bit, this is the smarter direction.

For reference you where able to integrate a just opened multi-use path with the completed GLX project as the community at pressed for it.

We too in Charlestown need better access by multi-use pathing!

The current Gilmore Bridge pedestrian path is way too narrow today! Most of the pathway with the new added load of the Cambridge Crossing Development and for us to navigate across, not including the bikers which also need to ride within the pathway as its just not safe to ride within the road space.

So we need to fix this! First we need a new bridge which spans across the Orange line, Leverett Circle pathway and the Commuter rails to Morgan Ave meeting up with the cycleway it offers. this is for both bikers and an autonomous people mover!

A small people mover (MiniBus) which can shuttle people across from within Charlestown to The Lechmere station to leverage both the Green Line service as well as the buses which go deeper into Cambridge.

We have a plan to move us way from personal vehicles as we can't over come the limits of the bridges which isolate us and the pathway widths. Nor are we willing to grow our car population as it already exceeds what

the community has for parking! And not environmentally the correct direction, we want the reverse! Less need for a car with Intra-Community and First/Last transit solution to our local rapid transit stations.

In addition the walkway space still needs to be widened along the Gilmore! So the narrow spaces along the path are wide enough to support the population which uses it. To be clear we have a two opposing flows at odds here! People exiting Charlestown to Cambridge and the Cambridge Crossing crowd trying to gain access to the Community College Orange line station.

A bit of background on me

I'm a resident in Charlestown for over 40 years! And have been advocating better pedestrian and cycle pathways both within and exiting our community! As well as more mass transit that serves our needs.

As of late I've become very worried with failure of moving forward with our Rutherford Ave rebuild which is needed badly to reduce the conflict of us venturing beyond, across our three egress pathways: City and Sullivan Sq's as well as the Gilmore bridge. We need to stick with the 2019 design with just some very minor alterations that serves our needs not Everett's!

Rethinking the Rt93 North onramp to be with the Rt1 onramp, adding a Rt1 onramp directly from the Gilmore Bridge both to reduce the Rutherford Ave traffic load and offer additional street calming features along Rutherford Ave. Besides the road diet we have within the 2019 design.

Working the a group in Medford we managed to get the Maffa Way and Mystic bridge replacements design to offer better pedestrian and cycle pathways which is now funded <Thank You!>

We still have one more bridge on Cambridge St which needs replacing as well (all three were built around the same time) this bridge needs transit under it to serve the Lost Village area and the coming redevelopment of two large projects along the Cambridge Street area so people can cross to the Sullivan Sq T station without risk as well as for the area to gain better access to Hood Park and onwards into Boston by foot or bike.

A Population Warning!

Our current PLAN: Charlestown process currently has us growing out to better than 35k residents and around 15k of workforce coming into us! Thats a lot people of movement.

We are already tipping the scale at 21k today and with the Bunker Hill Housing projects completion we are expecting well over 6k of new residents within the completed project. With about another 1k of other lose projects. This doesn't include the new workforce entering our community! So just adding these in (21+6+1=28k) all within the next 5 ~10 years of new residents!

Between all of these new projects we are expecting around 5~8k of people seeking work within our community! ~2k presently we could have up to 10k trying to get into us just with these current developments!

Which is why the Everett traffic is such a concern as we just can't expand our community with there added transit load on our streets. In fact we need to reduce it! With better mass transit which doesn't use street space.

While on paper the Silver Line looks like a great solution its no different than trying to cut a dinner roll with a butter knife Vs a serrated knife for the task! **The wrong tool**

I say this as I've lived in Germany for a short while on a job assignment where they too have these stretched buses. They are great on the straight roads running between the major villages, but within the older city spaces on narrow streets they get caught up. Here we have already a congested road space during the AM/PM rush windows and already see people not observing the don't block spaces and even the buses doing it

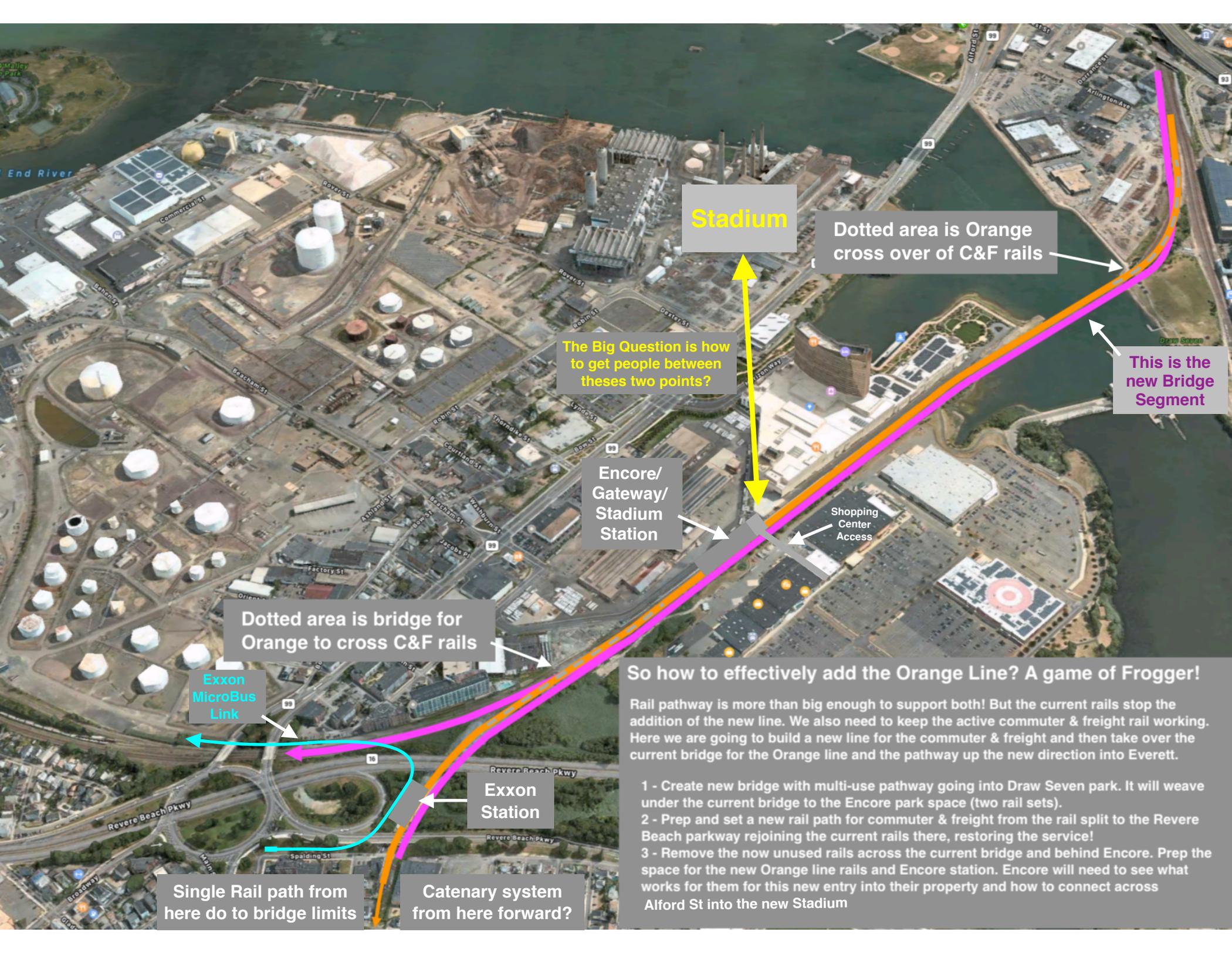
too from Sullivan Sq station! Thus adding to the pain of this road space we need to cross our selves! **We don't need or want grid lock on Rutherford Ave with these stretched busses!**

The best the Silver Line can do is get to Sullivan Sq! we can't let it travel to the Gilmore or City Sq as then we are in big trouble.

Again, to be clear I do want much more mass-transit! Its' just the solution needs to fit without added more ramifications! And I'm a skin flint too I only go with what fits not the incomplete cheap solution which will fail. I've already seen that a few times now within our own Boston transit spaces.

Lets not kill one community for another here **PLEASE!**

Dan Jaffe



Stadium

Dotted area is Orange cross over of C&F rails

The Big Question is how to get people between these two points?

This is the new Bridge Segment

Encore/
Gateway/
Stadium
Station

Shopping
Center
Access

Dotted area is bridge for Orange to cross C&F rails

Exxon
MicroBus
Link

Exxon
Station

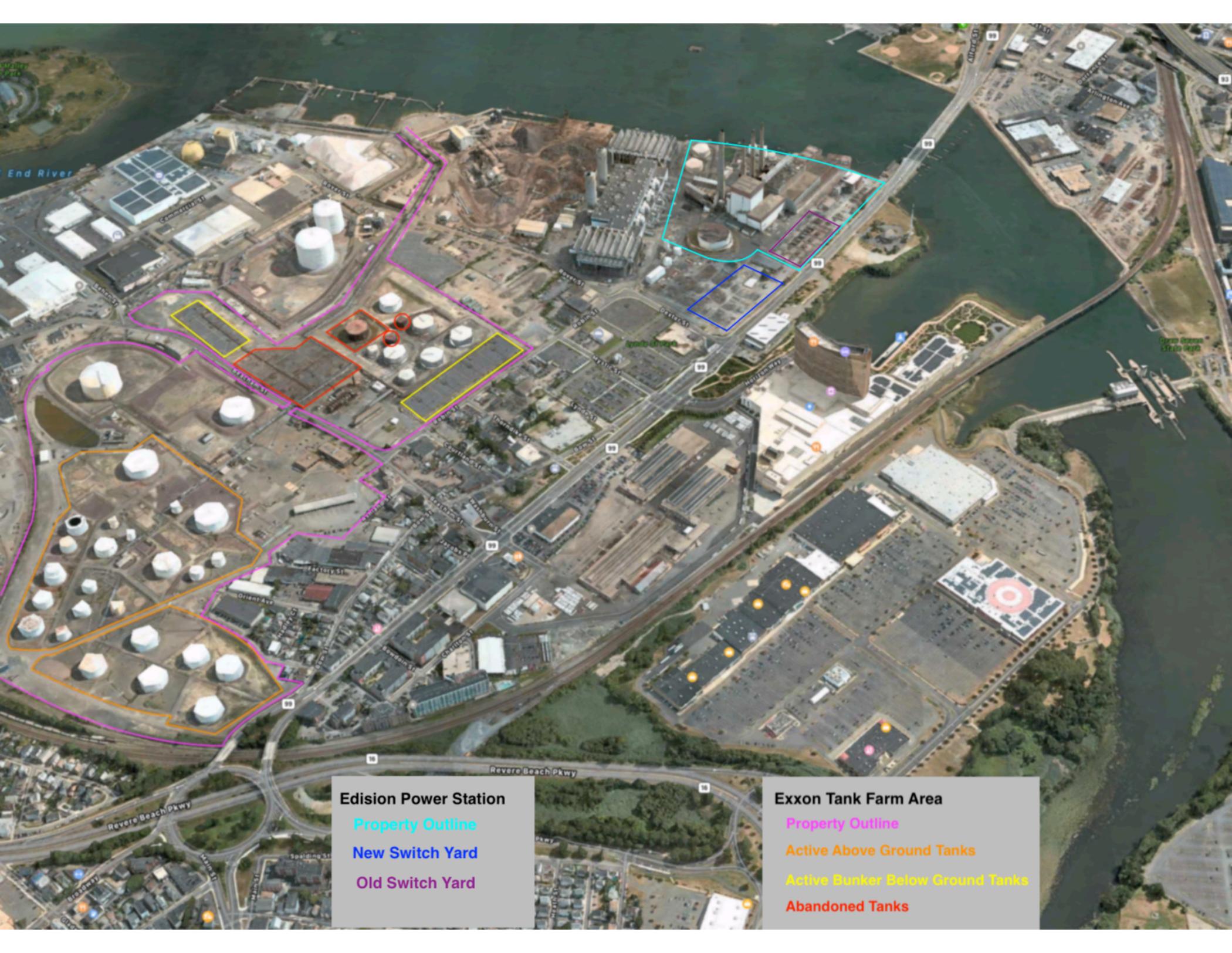
Single Rail path from here do to bridge limits

Catenary system from here forward?

So how to effectively add the Orange Line? A game of Frogger!

Rail pathway is more than big enough to support both! But the current rails stop the addition of the new line. We also need to keep the active commuter & freight rail working. Here we are going to build a new line for the commuter & freight and then take over the current bridge for the Orange line and the pathway up the new direction into Everett.

- 1 - Create new bridge with multi-use pathway going into Draw Seven park. It will weave under the current bridge to the Encore park space (two rail sets).
- 2 - Prep and set a new rail path for commuter & freight from the rail split to the Revere Beach parkway rejoining the current rails there, restoring the service!
- 3 - Remove the now unused rails across the current bridge and behind Encore. Prep the space for the new Orange line rails and Encore station. Encore will need to see what works for them for this new entry into their property and how to connect across Alford St into the new Stadium



Edison Power Station

Property Outline

New Switch Yard

Old Switch Yard

Exxon Tank Farm Area

Property Outline

Active Above Ground Tanks

Active Bunker Below Ground Tanks

Abandoned Tanks

A stadium for Everett?

March 22, 2023

Whether or not a stadium is built by the Kraft Family to house the Revolution soccer team which they own is a question remaining to be officially answered.

As we note in our news article in this edition, there are some restrictions on the use of the land in addition to substantial pollution and removal costs for the buildings and chimneys.

However, if the restrictions are overcome in the Legislature – and our bet is that the Legislature will do the right thing – then Everett is on the cusp of welcoming a major league soccer team to be housed in a major league, state of the art soccer stadium to likely be built by the Kraft Family.

Will this be good for Everett?

You bet it will be good for Everett.

From a tax standpoint alone such a soccer stadium will contribute untold millions yearly to the city treasury in property taxes.

Such a facility welcoming 20,000 to 30,000 people to games will cause the need for hundreds of employees, and

suppliers, and every form of business consistent with the operation of a major stadium.

By itself, the jobs are an incredible bonus.

Then there is the reputational aspect of the soccer stadium housing the Revolution.

This stadium would become one of the best known sporting venues in New England.

What's more foreign soccer teams coming to America will play in such a stadium and make it known all over the soccer world – which is the entire globe.

The removal of the century old brick monster buildings housing five story high generators and the colossal chimneys and everything all around it down to the ocean's shore will be one of the great days in this city's history when it arrives.

Putting back to decent use 45 acres of land that has been imprisoned by filthy commercial use and pollution ten feet deep is the kind of turnaround other cities throughout the nation can only dream about.

There are several negatives that accompany a soccer stadium seating 20,000 to 30,000 spectators.

Most of them will drive here and park their automobiles here and will cause traffic jams quite like never before seen in this city on Lower Broadway.

But this inconvenience will not outweigh the benefits of a grand stadium and everything that comes with it.

Then again, who really cares about occasional traffic jams on Lower Broadway when you come right down to it?

Bottom line, such a sporting venue on Lower Broadway will be of great benefit to this city financially as well as for the city's reputation.

Wynn Resorts knows exactly what it is doing buying this land.

The Kraft Family understands how to build grand sporting stadiums – Foxboro chief among them.

The marriage between Wynn Resorts, the Kraft Family and Everett is something to wish for and when it happens, to cheer about.

We believe this day is just around the corner – the sooner the better.

Developer set to buy 95-acre tank farm site near Encore casino in Everett



A massive power plant across the street from Encore Casino in Everett and neighboring gas tanks owned by ExxonMobil are slated for redevelopment over the next few years in a move that promises to remake the industrial area on Boston's northern doorstep. DAVID L. RYAN/
GLOBE STAFF

Prominent Boston developer The Davis Companies has reached an agreement to buy a roughly 100-acre tank farm in Everett from ExxonMobil, positioning one of the largest available development sites near Boston for a sprawling mixed-use project.

Meanwhile, power plant owner Constellation has agreed to put a 45-acre portion of its nearby Mystic Generating Station up for sale.

Taken together, the two properties could bring about massive changes to this industrial area on Boston's northern doorstep, an evolution that kicked off with Wynn Resorts' decision to build a casino and luxury hotel on the site of an old chemical factory overlooking the Mystic River. Wynn has more in the works, including a nearly 1,000-seat events venue and restaurant alongside a parking garage across Broadway (Route 99) from the Encore Boston Harbor casino complex. Meanwhile, The Kraft Group has been rumored to be in the mix for this area, known

as the Lower Broadway Economic Development District, as part of the search for a home for the New England Revolution soccer team.

“Everett residents finally have the chance to realize the benefits of the types of economic development opportunities they deserve with the redevelopment of the ExxonMobil ... parcel and the Constellation Energy generating sites,” Everett Mayor Carlo DeMaria said in an e-mail. “I have always known the potential that Everett has to evolve from its industrial age commercial uses because we have the acreage that is no longer found in surrounding communities.”

DeMaria said he hopes the developer interest can help city officials make the case for public transit improvements, such as an extension of the Silver Line bus system or a new station for the commuter rail trains that travel through the city but do not stop there.

The city of Everett has touted much of the 95-acre Exxon property — actually four parcels that stretch from the Sweetser Circle rotary, at routes 16 and 99, all the way to the Mystic River — for life sciences. But Davis has not yet disclosed any plans for the site.



A rendering of Wynn Resort’s proposed events venue and parking garage across the street from the Encore Casino in Everett. Wynn originally proposed an 1,800-seat venue but has since scaled the project back to under 1,000 seats after rival theater operators complained to the state gaming commission. ELKUS MANFREDI ARCHITECTS

The firm’s chief development officer, Michael Cantalupa, confirmed in an e-mail that a Davis affiliate has signed an agreement with Exxon for its Everett fuels storage and distribution terminal, but would not comment beyond that. (Davis is also building a roughly 225,000-square-foot “last mile” distribution center near the Chelsea-Everett line, rumored to be for Amazon.)

Similarly, a spokeswoman for Exxon, which had hired brokerage firm JLL to market the site last year, declined to say much about the deal other than to confirm it and to add that it is consistent with the energy giant’s strategy to “continually evaluate and upgrade our portfolio.”

Matt Lattanzi, Everett’s director of planning and development, said city officials have had preliminary discussions with Davis executives about the developer’s interest but have not yet

seen any formal plans. He said the property in all likelihood will be home to a mixed-use project totaling millions of square feet, with some residential construction, likely close to Sweetser Circle. He said he's hopeful to see official plans submitted within the next few months.

"It's such a huge parcel, so heavily contaminated," Lattanzi said. "Seeing a redevelopment down there would be transformative."

Next to hit the market will be a big section of Constellation's massive riverside power plant. Most of the turbines have been shut down, and the two remaining gas-fired units, known as Mystic 8 and 9, are slated to be retired in mid-2024. Spokesman Mark Rodgers confirmed Constellation hired brokerage firm CBRE to sell its already decommissioned units, labeled 1 through 7, and much of the land around them. The process will start in the third quarter of this year, with a goal to "maximize benefits" for Constellation and for Everett, Rodgers said.

A number of potential buyers have expressed interest, Rodgers said. The sale process, he said, is designed to create "a fair process for all interested parties." The two electric transmission switchyards next door are owned by Eversource, and are not part of the sale. Because the Mystic power plant parcel is across Broadway from the casino and adjacent to Wynn-owned land, the Las Vegas-based company is viewed as a possible buyer. But all spokesman Michael Weaver would say when asked about its potential interest is that it is "very supportive of redevelopment" at both the Exxon and Constellation sites.



Part of the Mystic Generating Station in Everett will soon be put up for sale for redevelopment.
PAT GREENHOUSE/GLOBE STAFF

DeMaria has envisioned a dining and entertainment district along that stretch of Broadway across from the casino. For that reason, Everett officials added the section of the power plant property in question to an urban renewal area last year that would enable the city to take it by

eminent domain, although officials said at the time they would prefer to see a private sale of the land instead.

Likewise, Wynn executives would like to see a hospitality-oriented area to augment their Everett casino, which opened in 2019. That's one reason why they're looking to build hotels, restaurants, and the events venue on 13 acres of Wynn-owned land across the street.

Then there's the Revolution.

The soccer team currently shares Gillette Stadium in Foxborough with the New England Patriots. But The Kraft Group have spent years looking for an appropriate place in or near Boston to build a roughly 20,000-seat soccer arena that the Revs could call their own. Several parcels that have come up for consideration in the past are now slated for other uses: The old Wonderland dog track in Revere is slated to be the site of a new high school, for example, while the former Bayside Expo property in Dorchester was acquired by developers who are proposing a large life-sciences oriented project. A spokesman for The Kraft Group declined to comment about any potential interest in Everett.

The movements with the Exxon and Constellation properties were welcomed by developer

John Tocco, whose V10 Development is planning two apartment complexes that would bring more than 600 units to old industrial properties just across the railroad tracks from the Exxon site, in an area known as the "Commercial Triangle."

Tocco said the developer interest in the Exxon site shows that when Everett residents approved the casino project, they were betting on something much bigger than a casino. They were betting on a full-scale revitalization of a major industrial section of their city.

"This is a tremendously exciting opportunity for the residents of Everett to see this industrial site transformed," said Tocco, who worked for Wynn in community and government relations before leaving in 2019. "It's really been a desire of the community, and the people I talked to, for almost a decade at this point."

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Mass. lawmakers have cleared the way for Robert Kraft to build a new soccer stadium for the New England Revolution in Everett

The amendment could provide a long-sought home for the New England Revolution

By [Matt Stout](#) and [Andrea Estes](#) Globe Staff, Updated July 15, 2022, 8:00 p.m.



The Massachusetts State House CRAIG F. WALKER/GLOBE STAFF

The Massachusetts House passed legislation late Thursday that could clear the way for Robert Kraft to build a long-sought soccer stadium for the New England Revolution on a waterfront property steps from the Encore Boston Harbor casino in Everett.

Without floor debate or public input, lawmakers added language to a wide-ranging, multibillion-dollar economic development bill Thursday evening that would exempt the 43-acre industrial property straddling the Everett and Boston line from a slew of environmental requirements so it could be developed as a “sports, recreation or events center.”

Two people briefed on the legislation said the amendment is designed to aid Kraft’s pursuit of a soccer stadium after more than a decade of [searching, but repeatedly failing to secure](#) a new home for the Revolution in or around Boston.

Everett Mayor Carlo DeMaria said in a phone interview Friday that he’s had “informal” conversations with the Krafts about the site, currently home to a power plant fronting on the Mystic River. DeMaria also said that officials at Encore have been pursuing potential partners to join them in redeveloping the property as something that’s “very complementary to their site.” “We are looking for something that’s spectacular,” DeMaria said of the property, whose owner Constellation Energy [has agreed to put a large portion of it up](#) for sale.

DeMaria said he’s aware of no “official plans” for redevelopment and stressed that the area needs more public transit options. But he welcomed the idea of a soccer stadium rising on the shores of the Mystic River.

“You have a lot of people who live in the cities of Everett and Chelsea and Revere . . . and in this area who love soccer,” he said. “It’s more friendly-family, it’s more affordable than most sports. If we can work on the transit issues and bring in something like this and truly light up that waterfront and make that spectacular looking, I think the people of Everett would love it.”

A spokesman for Encore declined to comment on the legislation or the property. Representatives for the Kraft Group did not respond to questions Friday.

But the legislative action infuriated some environmentalists, who said the amendment undoes environmental protections without any public input.

“This is exactly the kind of backroom, dead-of-night legislative mischief that breeds mistrust in government,” said Brad Campbell, president of the Conservation Law Foundation.

Kraft has for years searched for a site to build a professional soccer stadium to host the Revolution, the Major League Soccer team he owns. But after 20 years, the team is still playing in 65,000-seat Gillette Stadium, the home of the New England Patriots, which is too big for typical US soccer crowds.

“We want to build the stadium,” Jonathan Kraft, Robert’s son and president of the Kraft Group, told the Globe in 2020. “We don’t like failing and we clearly failed at doing that.”

The legislation comes at a time that other properties near the casino are also being eyed for development. Prominent Boston developer The Davis Companies recently reached an agreement to [buy a roughly 100-acre tank farm](#) from ExxonMobil, positioning one of the largest available development sites near Boston for a sprawling mixed-use project.

Under the legislative proposal, the property at 173 Alford St. would no longer be considered part of a designated port area, thus helping open it to non-maritime uses.

The amendment also would exempt the property from any “height, setback, open space or other dimensional limitations and requirements” under state tidelands law solely “for the

purposes of a sports, recreation or events center.” The exemption would be in effect only if the facility is permitted for construction within three years.

“It’s a fairly dramatic change,” said Bruce Berman, strategy and communications director for the environmental group Save the Harbor/Save the Bay, who has 25 years of experience in municipal harbor planning. “But in a way, it seems somewhat inevitable given the success of Encore.”

Campbell, of the Conservation Law Foundation, criticized the move, saying that without any public process, the language “would wipe away fundamental protections of the public interest that have been in place literally for centuries.”

“There is a process, for example, for changing the boundaries of designated port areas,” he said. “And if there’s justification for doing it, let them subject their proposal to the test of that process rather than cutting a sweetheart deal in the dead of night.”

The bill’s emergence surprised even close observers in Everett. State Representative Daniel J. Ryan, a Charlestown Democrat, filed it among roughly 870 other amendments to the House’s \$3.8 billion economic development bill, and House leaders tucked it into a hulking consolidated amendment that lawmakers approved around 7 p.m. on Thursday. The chamber passed the entire bill about 2 1/2 hours later.

The language must also pass the Senate before it could become law. Governor Charlie Baker is expected to support it should the language make it to his desk, according to one of the people familiar with the bill.

Its passage could help end years of fruitless searching for a stadium that has included attempts to build near the [UMass Boston campus](#) and on a [city-owned tow lot on the South End-South Boston border](#).

Somerville Mayor Joseph Curtatone [was interested in 2012](#) in bringing the Revolution to Assembly Row, across the Mystic from the casino, and also that year [officials in Revere](#) suggested the city could acquire Wonderland, the former dog racing track, as a potential stadium site.

At one point, a site in Roxbury was viewed as a potential location at a time when Major League Soccer began emphasizing the importance for its teams to have soccer-specific stadiums. But the talks never gained serious momentum.

Ryan, the amendment’s sponsor, said he personally had not spoken with the Kraft Group about the Everett site, and that he crafted the language with city and state officials and “people that represent Encore.”

“It makes the land more valuable. It makes the city and owners of the land more marketable. And they can determine what they want to put there,” Ryan said.

Not everyone in Everett welcomed the possibility of a soccer stadium. Fred Capone, former Everett city councilor who was narrowly defeated by DeMaria in last November’s election, said he has “serious concerns” about a potential stadium further jamming an already congested area with cars.

“It’s amazing what money can do,” he said. “We’re moving away from a community to a metropolis where absolutely everything is for sale.”

But DeMaria said he would be pleased if it was the Krafts who built on the land. “If that were to be the family who would develop it, that would be a great family to be associated with,” he said.

Samantha J. Gross and Jon Chesto of the Globe staff contributed to this report.

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