

August 9, 2010

David Mohler
MPO Transportation Planning and Programming Committee
State Transportation Building
10 Park Plaza
Boston, MA 02116

Delivery by Adobe PDF via email to David.Mohler@state.ma.us

Subject: Draft 2011-2014 Transportation Improvement Program

Dear Mr. Mohler:

LivableStreets Alliance would like to take this opportunity to comment on the Draft FY2011-2014 Transportation Improvement Program (TIP).

We appreciate that the MPO strives to balance transportation projects across multiple modes and to provide people with many options for how they travel, including walking, bicycling, and public transportation in addition to driving. Many of the projects in the TIP truly are multi-modal, and will indeed bring us closer towards our statewide goals outlined in new policies such as the Healthy Transportation Compact, including:

- **Massachusetts Ave, Arlington** (which includes a road-diet, wider sidewalks, improved crossings, and bike lanes)
- **Massachusetts Ave, Boston** (which recently incorporated bike lanes into the project)
- **South Bay Harbor Trail** (adding much needed connectivity to our urban pathway network)
- **Cambridge Common** (improving on one of our very popular public spaces)
- **Beacon Street, Somerville** (which we expect will include bike lanes along one of the busiest bicycle-commuting corridors in the Boston region)
- **Somerville Community Path** (connecting the most popular multi-use path in the country, the Minuteman, to our much-beloved Charles River Parklands)
- **Route 99 (Alford St Bridge), Boston** (which includes bike lanes on the only bridge between Boston and Everett/Chelsea/East Boston on which bicycles are allowed)
- **Longfellow Bridge, Boston/Cambridge** (a signature project which includes not only pedestrians, bicyclists, and automobiles, but also the busiest subway line in the MBTA system)

There are two very expensive projects in the TIP that concern us: Route 128 Improvement Program (which we will refer to as the “Add-a-lane” project), and Route 2 (Crosby’s Corner), Concord/Lincoln. These two projects combined make up over 15% of the total Highway Program budget allocated for 2011 through 2014.

	Total Cost 2011-2014	% of Highway Program 2011-2014 (\$985,732,379)
Route 128 Improvement Program	\$101,400,000	10.3%
Crosby’s Corner	\$53,719,658	5.5%

Route 128 Improvement Program

We recognize that the decision to widen Route 128 to 4 lanes where it is currently 3 is in part intended to increase safety by creating a permanent travel lane instead of allowing for shoulder use at rush hours. However, **we would like to express our disappointment that no alternative options were evaluated or chosen** and that no transportation demand measures (TDM) have been considered. For example, to increase safety, the shoulder use during rush hour provision could have been eliminated, and the addition of new transit service to the area could help to make up for the reduced rush-hour roadway capacity.

In fact, the MPO process strongly supports such a concept. Chapter 1 page 8, of the TIP, which describes the 3C Process states *[emphasis added]*:

Mobility

To improve mobility for people and freight, the MPO will:

D. Fund projects that expand the existing transportation system’s ability to move people and goods in areas identified in the Boston Region Mobility Management System, the MBTA Program for Mass Transportation, the MPO’s Regional Equity Program, MPO and EOT freight studies, and through public comment. *This includes encouraging options that manage demand. Adding highway capacity by building general-purpose lanes should be considered only when no better solution can be found and should be accompanied by proponent commitments, developed in the environmental review process, to implement TDM measures.*

F. *Support programs that meet public transportation needs in suburban communities, including improving access to existing public transportation and partnering with others to initiate new intrasuburban services linking important destinations.*

MBTA and other transit service in the 128 corridor is severely lacking, and we very strongly think that increased transit options for the area would be a far better way to meet the needs of commuters in the area than the addition of another general travel lane. The vast majority of commuting trips along 128 are by single occupancy automobile, supplemented only by shuttle buses run by the 128 Business Council and other employers. Additional transit service would not only help to reduce congestion today but would better accommodate the expected growth of industries in the area. And although the private buses that serve the corridor today are quite popular, better transit service that is part of the MBTA system would be utilized by even more people, since it would be easily accessible to everyone and would support payment-linked trips to existing MBTA trains and buses.

Since the Add-a-lane projects along Route 128 will continue to be built over the next few years, **we would like to suggest that this new highway capacity be used more efficiently**, to provide additional transportation options and to reduce induced-demand effects that new general highway lanes typically cause. For example, this new lane (as well a lane in each of the sections that are already four lanes) could be converted into an HOV lane on which new circumferential bus rapid transit (BRT) service to and from the many employers in the area and existing MBTA stations could run. This HOV lane would also benefit the private transit buses that serve the area as well as encourage more drivers to carpool. We would also suggest that this HOV lane also act as an HOT (high occupancy toll) lane. This would bring additional much-needed transportation revenue to the state as well as provide another option for drivers to bypass congestion.

Crosby's Corner

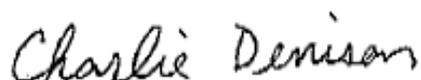
We recognize the fact that Crosby's Corner has above-average crash rates due to the configuration of the intersection and high volume of traffic it carries, and we applaud the MPO for dedicating funding to increasing safety and mobility through it. However, **we think the current project as designed is the wrong solution** due to its complexity and expense.

This project looks to create a grade-separation so that traffic on Route 2 can proceed uninterrupted in both directions. While this will arguably increase safety for those on Route 2, it has a very detrimental impact on the surrounding area through the creation of a highway interchange. We have heard from MPO representatives in the past few months that in upcoming years the state hopes to convert Route 2 into a true limited-access highway through this section where there are currently a number of 4-way signalized intersections. We think this is a mistake. This will essentially be adding highway capacity at a time when we are trying to spend our scarce transportation dollars more wisely by investing in healthier, cleaner, more efficient ways for people to travel. Furthermore, if Crosby's Corner is a comparable example of the cost of reconfiguring these other intersections, we would again be spending significant resources on additional highway capacity that could be put to much better use on projects that would help reduce traffic volumes instead of accommodating more of it.

We think that less expensive, less complicated, context-sensitive improvements can and should be made to Crosby's Corner to improve safety. This could include the realignment of roadways, changes to traffic patterns, and signal timing improvements, all for far less than the \$53+ million dollars currently planned for this one intersection.

Thank you for considering our feedback as the TIP moves into its final form. If you have any questions or comments, please contact Charlie Denison, Advocacy Director, at charlie@livablestreets.info or 617-852-6125.

Sincerely,



Charlie Denison
Advocacy Director