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Comments on the CIP submitted to the MassDOT Board of Directors and MBTA Fiscal and Management Control Board

April 8, 2016

On behalf of Transportation for Massachusetts, a coalition of 58 member organizations dedicated to improving transportation across the Commonwealth, I would like to offer preliminary comments on the concepts publicly presented on the proposed five-year capital investment plan (CIP).

Our coalition looks forward to reviewing the draft plan when it is released on Monday, and we are committed to promoting and participating in the series of public meetings planned for April and May.

While a full plan has not yet been released, based on public presentations and discussions, we offer comments in advance of the release of the draft plan that we hope will be helpful to you.

Our coalition supports a mix of funding to maintain, modernize, and expand our transportation system. We applaud the Baker Administration for combining the MassDOT and MBTA investment plans into one coherent investment blueprint.

Our coalition is pleased to see that the fruits of our coalition's work in 2013 are reflected in this plan. Along with allies, partners, and elected and administration officials, we advocated for a significant increase in available funds for transportation that resulted in the Transportation Finance Act of 2013. However, the legislation came up short of what was needed, and parts of the law have since been repealed, leaving the state with insufficient resources to fix the system we have and build the system we need.

Investments

The following reactions are to investments outlined in public presentations on the CIP we have seen so far. We will put forward comments after the complete draft plan is released.

- T4MA is encouraged to see **Green Line Extension** moving forward under this plan. It must remain a commitment in the final CIP, and it is vital that all of the core functions of the project are retained, i.e., all of the stations including Route 16, with light rail service (including Union Square), and the community path.
- This plan fully funds the **Complete Streets Program**. We thank the administration for its hard work to get this program off the ground, and we are pleased that so many communities have already expressed their interest in this innovative new program that will make our roads safer for everyone.

Executive Committee: 495/MetroWest Partnership • Alliance for Business Leadership
Alternatives for Community and Environment • Conservation Law Foundation • Environmental League of Massachusetts
Kendall Square Association • LISC • Massachusetts Public Health Association • MASSPIRG
Metropolitan Area Planning Council • Pioneer Valley Planning Commission • WalkBoston

- The plan appears to set the MBTA on a path to soon spend \$765 million per year on **state of good repair** investments. We support this allocation. It represents a significant increase over previous years' spending. However, we encourage you to treat the \$765 million annual investment as a minimum, and to increase the annual number to account for inflation and anticipated increases in construction costs. We also encourage you to seek resources to more significantly ramp up this investment in our core system over the five-year CIP period. If the allocation is held at \$765 million per year, it will take 25 years to address our backlog. This is too long a period for customers to wait for a system in good repair.
- The plan appears to make a serious investment in **bicycle and pedestrian infrastructure**, on roads, sidewalks, and off-road paths. We support this. We look forward to engaging in the bicycle and pedestrian planning processes that will be occurring in the coming year.
- Funds for the **Blue Hill Ave Commuter Rail station** are included in this plan, an important legal obligation that the community deserves.
- Our coalition supports a **study of the North South Rail Link** proposal. Our coalition has no position on the project. We, and others, need credible data to assess the costs and the benefits of the project. To ensure the analysis that is developed is accepted by groups outside of government, we urge the administration to convene an expert group of engineers and project managers of large infrastructure projects, to help guide and provide oversight to the development of the cost estimates and feasibility assessment. A comprehensive study that provides definitive and credible answers is needed, given the intense level of attention on this project.
- We thank the administration for planning to retain the **Western Turnpike tolls**, after a comprehensive triennial review was undertaken that showed that the road was not at a state of good repair. This toll revenue is an important source of funds for the upkeep of the Turnpike. Given the regional equity concerns with the current tolling structure, we hope that a comprehensive discussion of tolling in Massachusetts will soon begin. With all-electronic tolling technology already here, and some flexibility at the federal level, we are eager for this conversation.
- Funding **studies** of key areas such as Route 107, Sullivan Square, and Arsenal Street will identify key improvements that will bolster communities and support local and regional economies.
- While other parts of the country continue to **expand highways**, which increases vehicles-miles travelled and congestion in the long-term, we appreciate that the vast majority of expansions in this plan are in the area of public transportation and bicycle and pedestrian infrastructure.
- Our coalition supports strategic investments on the **Fairmount Line**. While we are disappointed that DMUs will not be funded in this CIP, we are encouraged by public statements that officials continue to explore them, and there may be an effort to

refurbish locomotives and coaches to making up small train sets could be used on Fairmount, and potentially other lines such as the **Knowledge Corridor**. We ask that the vision for service and investments on the Fairmount Line is laid out in the CIP.

- While several slides of the presentation note **“historical” spending** levels, we ask for a consistent, apples-to-apples comparison of this plan to previous CIPs.
- Finally, we are encouraged by public comments by Secretary Pollack, as well as increased attention on **transit signal priority** more generally. However, this concept is not mentioned in the slide presentation. These relatively low-cost improvements require partnership with municipalities, and could help enhance the efficiency and capacity of existing and future bus routes. In the future, we hope that when modernizing roads that serve bus routes, planners will routinely consider including transit signal priority technology, and funding will be available to pay for it.

Questions

- **How were the project selection criteria used?** Our coalition asks that the full version of the CIP clearly explains how project selections were made, including the role of the Project Selection Criteria. Producing a final report in June of 2015, the Project Selection Advisory Council recommended a set of criteria and a process for which to identify, rate, and select projects for investment. Criteria included mobility, environmental, social equity, and system preservation, among others. While the Council’s recommendations did not specify an entirely new procedure for the capital planning process, a lot of hard work and difficult decisions went into the criteria. And though we realize that this is the first capital plan since the Council’s report was issued and there are many moving pieces to be considered when developing such a large plan (regional equity among others), we expect that the new project selection criteria would be used as the primary filter for determining how the state will use its limited resources. We ask that the CIP explain how the criteria were used and that you include the project ratings. We appreciate the administration’s commitment to transparency, and look forward to reviewing this data. We will continue to stay engaged on the Stakeholder Advisory Committee as the project selection criteria are put to work.
- **How does the plan help the state meet its climate and mode shift goals?** We ask you to outline how the CIP will help Massachusetts meet key state goals, and explain how these goals were considered during the development of the plan. The Commonwealth’s greenhouse gas reduction (25% below 1990 levels by 2020 and 80% below 1990 levels by 2050) and mode shift (tripling walking, biking, and public transit by 2030) goals are achievable through sound decision-making that puts these goals front and center as we make our collective investment decisions. One key way to achieve both of these goals is through the reduction of vehicle miles traveled (VMT). Will the CIP reduce VMT? We believe this should be a central metric in assessing the value of the plan to the state’s residents.
- **How does the plan expand access and opportunity for the state’s low-income residents and communities of color?** Another central metric for assessing the value of

this plan is expanded access for low-income people and in places that have experienced historic underinvestment. How will this suite of investments improve the lives of low-income and minority populations? Historically, many transportation decisions have had adverse impacts on low-income and minority communities. The CIP should include an assessment of the equity impacts of these investments.

- **How will service improve from the customer perspective?** The CIP should include a forecast of how the investments will improve service and performance on roads and public transit. For instance, will the signal and vehicle investments on the Red Line and Orange Line result in rush hour service every four minutes and 90% reliability? Will the investments in regional transit authorities (RTAs) increase frequency and hours of service across the state? Will traffic congestion be relieved as a result of the roadway investments?
- **This plan provides insufficient funding for public transit expansions.** We ask that the final CIP lay out a plan to be able to complete key projects including South Coast Rail, the Allston interchange including West Station, and South Station Expansion. In order to be transparent, the CIP should outline the next steps, timeline, and funding needed to complete these projects.

Looking Ahead

While this is a strong capital plan that invests \$14.3 billion dollars over the next five years, we believe that it also demonstrates the need for more resources for transportation investments across the state. Given that the majority of the plan is maintenance for the existing system, this CIP will help fix the system built for our residents and employers years ago. But our economy is changing and growing, and our transportation system needs to support the economy that we have today and want for tomorrow. A broken and incomplete transportation system that does not serve today's and tomorrow's workers will hold us back and hurt our national and international competitiveness.

This plan funds Chapter 90 at only \$200 million per year for five years. This is a 33% cut from last year, and is less than one-third of the figure that the Massachusetts Municipal Association says is needed. Such flat funding of a priority of the Governor, Legislature, and 351 cities and towns demonstrates the transportation funding constraints our state continues to experience.

Last year, the Governor's Special Panel on the MBTA recognized the need for new revenue and recommended that the MBTA prepare both a 5-year and a 20-year capital plan which would include recommendations for adequately funding our needs. We hope that the "Focus 40" planning process will focus on what we need, not just what we have. It should include an assessment of the level of new resources that are necessary to fund the MBTA's needs.

Around the country and the world, we are seeing strategic expansions in modern transportation networks to support economic development. With limited exceptions, expansions that are widely supported and needed in Massachusetts are not sufficiently funded in this CIP. There remain many unmet regional priorities all around the state. As you finalize the CIP, we urge you to begin a parallel process to develop a vision for the transportation our state needs, and a

roadmap for how we can get there. We look forward to engaging with you in this important conversation.

Thank you for your consideration of our perspective, and for your dedication to improving the lives of Massachusetts's residents.

Sincerely yours,

A handwritten signature in blue ink, appearing to read "Kristina Egan", with a long, sweeping flourish extending to the right.

Kristina Egan, Director