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## Comments on the Draft FY2017-2021 CIP

May 13, 2016

On behalf of Transportation for Massachusetts, a coalition of 58 member organizations dedicated to improving transportation across the Commonwealth, I am pleased to submit comments on the draft five-year Capital Investment Plan (CIP). Our coalition's staff and member organizations have participated in the public meetings over the past month and look forward to seeing the final approved CIP later this month.

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 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needed (estimated at the time to be roughly \$1 billion per year), and several components of the law have since been repealed, leaving the state with insufficient resources to fix the system we have and build the system we need.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

Consistent with the boards' vote on May 9, T4MA is glad the **Green Line Extension** is included in this plan. It must remain a commitment in the final CIP, and it is vital that all of the core functions of the project have a path forward and sufficient funding, i.e., all of the stations including Route 16 and the community path.

The plan makes significant investments in **bicycle and pedestrian infrastructure**, on roads, sidewalks, and multi-use paths. 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.

The plan sets the MBTA on a path to soon spend \$765 million per year on **state of good repair** investments. We support this commitment. It represents a significant increase over previous years' spending. Upgrades of red and orange line cars, signals, power, and more should have tangible effects on the level of service provided to riders. 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. 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

**Executive Committee:** 495/MetroWest Partnership • Alliance for Business Leadership  
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Metropolitan Area Planning Council • Pioneer Valley Planning Commission • WalkBoston

customers to wait for a system in good repair. Of note, there do not appear to be Green Line cars or sufficient MBTA buses in the plan, and we hope that the integrated fleet plan will inform future investments in vehicles.

The plan invests \$307 million in **Regional Transit Authorities**, crucial investments that will benefit communities throughout Massachusetts.

Our coalition supports strategic investments on the **Fairmount Line**. Funds for the **Blue Hill Avenue Commuter Rail station** are included in this plan, an important legal obligation that the community deserves. While we are disappointed that DMUs are not be funded in this CIP, we are encouraged by the proposal to refurbish locomotives and coaches to make up small train sets that could be used on Fairmount to deliver rapid transit service, and potentially other lines such as the **Knowledge Corridor**. We ask that the vision for service and investments on the Fairmount Line be laid out in the CIP—including a commitment to use refurbished equipment on the line.

While other parts of the country continue to **expand highways**, which increases vehicles-miles travelled and congestion in the long-term, we appreciate that most of the expansions in this plan are in the area of public transportation and bicycle and pedestrian infrastructure, continuing a recent trend in this state.

Our coalition supports the expenditure on a **study of the North-South Rail Link proposal**. 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. A major regional priority, the I-495/I-90 interchange re-design, receives funding in this plan.

We support the new **municipal small bridge program** included in this plan.

We are encouraged by increased attention on **transit signal priority**. However, this concept is not referred to in the plan. These relatively low-cost improvements require partnership with municipalities, and could help enhance the efficiency and capacity of existing and future MBTA, RTA, and TMA 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.

While overall, this is a strong plan that invests \$14.4 billion 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 existing resources, 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 provides insufficient funding for many projects.** The “project universe” contains 4,500 projects, with only 1,800 receiving some funding under this plan, and over \$30 billion worth of investments not funded. This figure does not include some major proposals that do not appear in the universe, including the Blue Line to Lynn and the Red-Blue Line Connector. There are many regional priorities that are not funded in this plan, including the following small sample: the Pioneer Valley Transit Authority's maintenance facility in Springfield to replace a 100 year-old facility, the McGrath Highway project, new MBTA Silver Line buses, or preliminary engineering and design work to advance the Inland Rail Route that was recommended by the MassDOT-sponsored Northern New England Intercity Rail Initiative.

Further, we ask that the final CIP lay out a plan to be able to complete major 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.

The CIP funds Chapter 90 at only \$200 million per year for five years. This is a 33% cut from last year's level, 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 a 20-year capital plan, which would include recommendations for adequately funding the MBTA's needs. We hope that the soon-to-launch “Focus 40” planning process will focus on what we need, not just on what we have. Our coalition is also eager to engage on upcoming long-term planning processes in bicycle, pedestrian, rail, and freight that will also help us to understand Massachusetts' transportation needs. We urge the administration to combine the public participation process for these plans.

### **Critical Questions**

**How does the plan help the state meet important 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). We believe reducing VMT should be a central metric in assessing the value of the plan to the state's residents. And residents need to know how expanding *access and opportunity for the state's low-income residents and communities of color* is advanced by this CIP. 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 and should be a central metric for assessing the value of this plan. Beyond these goals, we ask that you prioritize the development of a series of measurable goals that will inform future CIPs and annual performance reports.

**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 Lines 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?

**Do MassDOT and the MBTA have the capacity to deliver the projects in this plan?** We request that the Department report on its internal capacity and resources to simultaneously deliver this range of projects effectively and on time. We would like more information about the following issues of concern that have been raised:

- The effect of the anticipated \$30.9 million cut to MassDOT's operating budget for the coming fiscal year.
- The effect of the state's early retirement program on core functions of project delivery, including at district highway offices and in project management and construction. How many of the more than 400 recently-retired MassDOT employees were involved in capital project delivery?
- Are stricter federal regulations governing Right-of-Way takings requiring more effort, time, staffing, and/or expertise?

**Will you release more project selection data?** 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. 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). In this context, we are pleased with the steady progress that the Department is making in implementing the process, and understand that it will continue to evolve as key questions and challenges are resolved and new ones emerge. Our coalition will continue to stay engaged on the Stakeholder Advisory Committee as the project selection process continues to evolve. Developing and releasing the project universe, including project scores, was a significant undertaking and a great step. To further enhance transparency, we urge you to release the details of scoring, including how each project performed in each relevant category, and post this data in a searchable, user-friendly format. As the Council and MassDOT entertain a conversation about modifying the criteria weights, and project proponents learn about how their project scored and how they might improve it, this information will be valuable.

**How does the funding in this plan compare to previous plans?** Because of the way the document is laid out, it is difficult to compare to previous funding levels. We request an “apples-to-apples” comparison that shows program levels compared to previous CIPs, including the overall funding level, RTAs, and bicycle and pedestrian infrastructure.

### **What’s Next**

Thank you for the opportunity to provide comments, for your consideration of our perspective, and for your dedication to improving the lives of Massachusetts’s residents.

Regions around the country and the world are strategically modernizing and expanding transportation networks to support economic development. As described above, many regional priorities are unmet in this plan. We hope that the next step is 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 and many others across the state in this important effort.

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