

**Transportation for Massachusetts**

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MassDOT Office of Transportation Planning  
10 Park Plaza, Suite 4150  
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October 17, 2018

**Re: Comments on Draft Massachusetts Pedestrian Transportation Plan**

On behalf of Transportation for Massachusetts, a coalition of more than 70 member and partner organizations supporting a modern, safe, reliable and sustainable transportation network, thank you for the opportunity to submit comments on the 2018 Draft Massachusetts Pedestrian Transportation Plan.

We applaud MassDOT staff, its consultants and the Bicycle and Pedestrian Advisory Board for the extensive work and public outreach that contributed to this plan.

Our primary focus is on the utility of the plan as a tool to encourage implementation and maintenance of excellent pedestrian infrastructure at the state, regional and local levels, both on its own merits and as an essential component of an integrated transportation network. We are pleased to see that a key goal of the plan is supporting municipal efforts to improve walkability.

Better walking infrastructure is essential for its health benefits, for its economic value, as a means to promote equity, and as a way to improve the quality and experience of virtually every trip, regardless of which modes are used. Walking is a segment of most trips using public or private transportation, and well-designed walkways that separate and channel pedestrian traffic improve travel for people using other modes.

We offer the following suggestion for this plan and its implementation.

- Continue to emphasize the importance and value of improved walkability to all audiences. Walking is not sufficiently valued by members of the public and by some decision-makers. Continued education and marketing is very important. Since the plan itself is not likely to be read by all who would benefit from it, targeted messaging and key takeaways should be packaged and conveyed in other channels. The Governor and the Commonwealth have a respected voice, and it is valuable to use it. If we as a state truly want to encourage people to walk more often to more places, a communications effort should reflect this priority and should target people who primarily drive.
- Where the plan is intended in part to serve as a model for municipal practice and policy, consider the reverse, particularly since there is a perception among

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municipal leaders that the state holds cities and towns to a higher standard on some matters than it does itself. For example, many cities and towns provide the ability for the public to report issues and concerns, such as Commonwealth Connect. MassDOT might consider a similar tool so that when there is a defect or problem affecting a state owned sidewalk, it can be reported and addressed, or used to help prioritize investments and repairs. This would support Initiative 2 (“Establish a set of prioritized pedestrian projects on MassDOT-owned roadways and bridges that address safety, equity, accessibility and critical gaps in connectivity.”)

- Similarly, CIP-funded public transportation projects should obligate a municipality – ideally with a state funding match – to implement safe pedestrian accommodations within the project’s walkshed. Where municipal capacity is limited, or for equity reasons in general, these improvements should be funded as part of the overall project cost. We must avoid creating islands of transit investments that are disconnected from originations and destinations from the pedestrian’s perspective. The Environmental Justice citations in the Plan support this approach. This would support Initiative 4 (“Improve pedestrian accessible paths of travel to transit”).
- Consider providing incentives or bonus funding for walkability improvements as an inducement to cities and towns that encourage transit oriented housing, e.g. are designated as Housing Choice, to help align complementary goals of the Commonwealth.
- Similarly, consider how incentives focused on walkability can complement and leverage programs such as Complete Streets, Chapter 90, or safety-focused legislation such as slower speed limits. Where design is a contributing factor towards safety, and safety is a primary goal of the plan, this plan may have more impact if it is linked to incremental funding opportunities in line with MassDOT’s objectives.
- We applaud MassDOT’s inclusion of year-round maintenance plans, specifically snow and ice removal, under Initiative 5. Please consider producing and sharing model municipal legislation so that local bylaws and ordinances can become consistent, enforceable and appropriate.
- We suggest that the data collected, as envisioned under Initiative 6, be accessible to municipalities and the public (with appropriate privacy provisions, of course). Sharing information and encouraging visibility will encourage better policies, practices and projects.

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Finally, the release of this plan is an excellent opportunity to support legislation that would protect pedestrians, such as hands-free bills and other measures to move Massachusetts towards Vision Zero.

Thank you very much for your consideration.

Respectfully,

Joshua Ostroff  
Partnerships Director