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Response to MassDOT's Congestion Study

What's to Like, What's to Dislike, and What's Missing

On August 8th, 2019, the Massachusetts Department of Transportation (MassDOT) released a long-awaited [congestion report](#), commissioned by Governor Baker following his 2018 veto of a pilot program of smarter tolling. Transportation for Massachusetts (T4MA) thanks MassDOT staff and others who invested many hours into researching, writing, and presenting this information. The report is an important step toward addressing the Commonwealth's [worst-in-the-nation traffic congestion](#). Traffic costs the average driver in Greater Boston more than [\\$2,200 each year](#), according to traffic data firm INRIX, and is [often cited by Massachusetts businesses as a threat to the state's continued economic prosperity](#). The report finds that congestion is especially severe in Greater Boston, but also makes clear that traffic has impacts and consequences statewide. Congestion has helped make transportation the largest source of greenhouse gas emissions of any sector of the state's economy, and contributed to Massachusetts being home to [three of the 12 most challenging places to live with asthma](#) in the United States.

T4MA's response offers Ten Things to Like, Five Things Not to Like, and Five Things Missing from MassDOT's congestion report.

Ten Things to Like

1

Strong Overview of the Commonwealth's Congestion Crisis

Massachusetts is in a congestion crisis, and this report provides a strong overview of the problem. The report conveys new data and tools that will inform policymakers in the Administration and the Legislature who want to address this crisis, which impacts drivers, bus riders, and everyone who breathes our air. The report clearly links transportation and the environment, stating that “the Commonwealth cannot meet its goal of reducing overall greenhouse gas emissions 80 percent by 2050 without substantially reducing transportation sector carbon emissions.”

2

Embrace of Roadway Pricing to Reduce Congestion

The report represents the Baker Administration's first embrace of roadway pricing as a tool to reduce congestion. Of the ten largest metropolitan areas in the country, Greater Boston is the *only* one that does *not* use pricing to help manage congestion. It is long past time for the Commonwealth to experiment with this proven strategy, which the Federal Highway Administration calls “[the single most viable and sustainable approach to reducing traffic congestion](#).” The report distinguishes between different methods of congestion pricing, including variants such as “managed lanes” and “smarter tolling.” MassDOT's acknowledgment that pricing should be a tool in the congestion-fighting toolbox is an important step.

3

Call For Expansion of Bus Lanes

Buses consistently have the worst on-time performance of any MBTA service, and dedicated bus lanes are a critical way to get buses moving faster. **This report endorses not only the continued expansion of bus lanes on local/municipal roads, but also affirms that MassDOT should investigate bus lanes on state roads that it controls.** This is an important recognition that the Highway Division has a responsibility to elevate and enhance bus service, consistent with the goal of moving *people*, not vehicles.

4

Increase in Transit Capacity

The report is clear that increasing transit capacity is necessary to provide people with an option to get out of their cars and to avoid congestion. This means both fixing the transit systems we have today, and also making strategic expansions in the system (including more and faster bus service) that will serve and connect new neighborhoods, and move more of Massachusetts' talented workforce efficiently and equitably.

5

Connecting Housing and Transportation

The report makes the connection between housing and transportation, and specifically recommends building affordable housing near public transportation. The Governor's Housing Choice legislation is an important step toward addressing the state's underproduction of housing. Additional policies and legislation will be needed to ensure that the state's twin crises of housing and transportation are addressed urgently and equitably.



Ten Things to Like (continued)

6

Regulations and Incentives for TNC Rides

Uber and Lyft vehicles (TNCs) create 8% of all vehicle-miles-traveled in the City of Boston, and even more in some neighborhoods, such as East Boston. While we cannot solely blame TNCs for traffic, they are contributing to the problem. To address the congestion TNCs are causing, cities such as New York have updated their TNC regulations to tie fees to the geography and time in which rides occur. **Thoughtful regulations and incentives that encourage pooled TNC rides, and that increase fees when trips are taken on congested roads, will help reduce traffic for all road users. T4MA applauds the Baker Administration's support for this approach.**

7

Operating Roads, Not Just Fixing Them

The report calls on the MassDOT Highway Division to become experts in operating roads, not just building and maintaining them. Working to keep our roads and bridges in good repair is already a tough job, but it is not enough for the Highway Division to maintain our infrastructure only to let traffic return. Highway Division leaders must be focused on actively operating and managing the Commonwealth's precious roadway space. This will represent a critical evolution and reform of one of state government's most crucial and underappreciated organizations.

8

Prioritizing Moving People, Not Vehicles

The report uses an "accessibility" framework to assess the congestion problem and suggest what solutions might improve peoples' lives. As defined and described in the report, accessibility measures the degree to which people can reasonably reach jobs and amenities (like grocery stores) without excessive time, cost, or discomfort. Because the Commonwealth's roadways are so congested, workers are "locked out" from jobs that would otherwise be accessible to them. The report includes compelling charts that starkly show how access to jobs is reduced during the busiest times. **MassDOT's use of an accessibility framework is compatible with the objective that the Highway Division should be prioritizing moving people, not simply cars.** This was one of the signature recommendations of the Governor's Commission on the Future of Transportation in the Commonwealth.

9

Enhancing or Expanding the HOV Network

While other regions across the United States have built and managed networks of lanes dedicated to high-occupancy-vehicle (HOV) lanes, Massachusetts's network is meager and disconnected. **The report smartly recommends assessing MassDOT's HOV network and making recommendations for how it can be enhanced or expanded.** This report ratifies T4MA's view that the MassDOT Highway Division erred by closing the Southbound I-93 Northern Expressway HOV lane earlier in 2019.



Ten Things to Like (continued)

10

The Role of Employers in Mitigating Congestion

The report outlines how employers, working with MassDOT and the MBTA, must play an important role in helping their employees avoid and mitigate congestion. One concrete next step is a new Workforce Transportation grant program announced by MassDOT, through which \$4.5 million of federal air-quality funds will be available for workforce commute options. This grant program is open to employers, cities and towns, transportation management associations, regional transit authorities, and others. Also, the report's recommendation that employers offer and subsidize transit benefits complements language within the Governor's transportation bond bill that would permanently tie the maximum allowed level of pre-tax public transportation benefits to the level of pre-tax parking benefits. Due to a quirk in state law, the current parking benefit maximum is higher than the public transportation benefit maximum. We strongly endorse this provision of the bond bill, and thank the Administration for including it. T4MA supports policies that encourage employers to provide employees with transit, carpooling, biking, and walking options.

Five Things Not to Like

1

Adding New Highway Lanes

The report's suggestion that *adding managed highway lanes will reduce congestion is inconsistent with the data.* Building new highway lanes, even those that are priced, will induce more people to drive and will exacerbate bottlenecks. While T4MA supports the concept of managed lanes, these lanes must be built only from existing highway capacity (including existing HOV lanes). The report appears to suggest that adding managed lanes “pose[s] fewer equity concerns than other types of congestion pricing.” This definition of “equity” does not account for the negative public health impacts on communities near expanded roads, nor the climate impacts of inducing more driving. Even if this were effective policy, adding a lane can require a decade or more of construction at enormous expense. As the report states in a separate section, adding a lane to 13 miles of Route 128 took about 16 years to complete, at a cost of around \$420 million. T4MA agrees with Secretary Pollack's statement at the congestion report press conference that MassDOT, “[is] not in the lane building business.” It should stay that way.

2

Unsubstantiated Dismissal of “Smarter Tolling”

The report draws unsubstantiated conclusions about the potential value of “smarter tolling,” a technique used by all of the ten largest metropolitan areas in the United States except Greater Boston. The report posits that because toll gantries were placed to collect revenue, they must not be in the right position to reduce congestion, yet it provides no evidence to buttress this claim. Perplexingly, rather than suggest a pilot program that would allow MassDOT's unsupported hypothesis to be tested, it concludes that a pilot is not worth attempting.

3

Telecommuting Tax Credits

While it will be important for the Commonwealth to work with employers to reduce congestion, the Governor's proposal to provide tax credits to companies for telecommuting would be both costly and ineffective. These dollars – up to \$50 million per year – would be better invested in the expansion of transit, bus lanes, and other tools that “scale” as they become more popular. Alternatively, these funds could be used to offset the cost of expanded tolling on low-income drivers. T4MA agrees with the [critique offered in Commonwealth Magazine](#) by long-time analyst of Massachusetts state government Mike Widmer.

4

Reliability vs. Duration

The report states that commuters care more about reliability than about trip duration, but provides no data to support that claim. **T4MA believes that both reliability and trip duration are important. A consistently gridlocked commute is not acceptable, even if it reliably happens every day.** We can and must have higher standards for our roadway system: we can reduce congestion and pollution from transportation, and improve reliability all at the same time.



Five Things Not to Like (continued)

5

London's Experience with Congestion Pricing

The report calls out London's experience with "cordon" congestion pricing, a policy that the city put in place in 2003. **The report downplays the success of the program while overemphasizing later challenges that London is now proactively working to address.** New regulations that London is rolling out over the next two years, including ones to address TNC trips, should be watched closely. While London's congestion pricing program has not been perfect, [it indisputably demonstrates that pricing can impact driving behavior and reduce traffic](#). Of course, programs need to adjust over time, just as [London regulators are now doing](#). London was a model for the congestion pricing system that New York City is now in the process of implementing. Massachusetts should take a page from London's success.

Five Things Missing

1

Traffic Can Be Fixed Through Good Public Policy

New Englanders have long thought about traffic like the weather: “it’s always been this way, it’s always going to be this way, and it’s out of our control.” But weather and traffic are fundamentally different. This afternoon’s weather is caused by mother nature, this afternoon’s traffic is a result of human beings making decisions to drive on certain roads at certain times of day. **Like any phenomenon that results from human choices, traffic congestion can be changed by better public policy.** While the report *implicitly* acknowledges this by offering policy tools for congestion reduction, this dynamic deserves an *explicit* mention because it is such a fundamental and illuminating premise.

2

Traffic Congestion is Non-Linear

Another crucial and informative concept that should be made more explicit is that traffic is a *non-linear* function. Once a road reaches its designed capacity, every vehicle that gets added to the road creates *more* congestion than the car that came before it. Just a few additional cars can make a road go from free-flowing, to congested, to gridlocked. The only silver lining of this unfortunate dynamic is that when roads are gridlocked, getting a relatively small number of cars off the road can produce substantial improvements. **The rule of thumb used by economists is that a 5% reduction in vehicles can lead to a 20% reduction in congestion delay.** This dynamic provides some hope that policies that get cars off the busiest roads at the busiest times can produce large benefits to society.

3

Demographics of Road Users

The report wisely makes mention of the importance of incorporating equity into our transportation decision-making and policies. But it neglects a discussion on the demographics of who is using our roads and how they are using them. **Our status-quo transportation policies reflect decades of inequitable decisions, and will require careful analysis and understanding of how proposed policies can help and harm different groups.** For example, if many bus riders have lower incomes and many drivers have higher incomes, bus lanes that make buses move faster and more reliably and disincentive driving can make our transportation system *more fair* in addition to making it *more efficient*.

4

Successes in Other Parts of the U.S.

The Administration’s embrace of pricing as a potential tool to reduce traffic is to be applauded. **However, the report could have delved deeper into the success that managed lanes and other pricing tools have had in other parts of the United States. It could also have discussed Federal Highway Administration programs that permit tolling on existing interstates, contrary to the pervasive view that tolling of federally-funded roads is “not allowed.”** The Administration has said it will investigate managed lanes further, and we look forward to the results of those investigations.



Five Things Missing (continued)

5

The Role of Private Commuter Buses

The report does a good job of explaining the importance of expanding public transportation, but it is surprisingly quiet about opportunities to leverage privately operated buses and shuttles to help our transportation problems. Private commuter buses operated by companies such as Peter Pan, C&J, and Plymouth & Brockton move thousands of Massachusetts commuters each day, and have the potential to expand and serve more people if and when MassDOT adopts some of the policies described above.

This congestion report is an important milestone in the Commonwealth's conversation about our worst-in-the-nation traffic congestion. T4MA looks forward to working with the Administration and the Legislature to overcome the challenges, and build on the opportunities, described in this report. Transportation is a complex system requiring fixes and improvement that can take months and even years to implement. We need to start now, and the congestion report provides the platform.

For more information on potential solutions to the ongoing congestion issues in Massachusetts, visit: <https://www.t4ma.org/traffic>.