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Director

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John Cogliano, Secretary
The Executive Office of Transportation
10 Park Plaza, Suite 3170
Boston, MA 02116

RE: the Commonwealth’s 20-Year Transportation Plan: a Framework for Thinking, a Plan for Action

Dear Secretary Cogliano,

The Smart Growth Alliance has been working with a diverse group of organizations to analyze the draft 20-Year Transportation Plan, “A Framework for Thinking - A Plan for Action.” We are pleased to submit comments on this document. The current draft provides the Commonwealth with an essential core planning document that we look forward to working with and implementing. Long range transportation investment planning is indispensable to economic development and the maintenance of a high quality of life in Massachusetts. The draft admirably begins the task of evaluating and planning transportation investments for the future, with broad policy objectives, fairly clear criteria and a comprehensive vision that includes all transportation modes. We commend the Romney Administration for undertaking this important effort.

While, overall, we feel that this draft provides a very good “Framework for Thinking,” we also feel that it falls short in the second part of its mission: to provide “A Plan for Action.” The principles of the plan and some of the broad directives are positive steps, but the plan lacks clear details regarding implementation. We are also extremely disappointed by the failure to date to provide a meaningful public process for either creating or reviewing this draft plan.

We submit the following comments, which highlight the strengths of the draft plan and identify areas of concern.

A. The Draft 20-Year Plan Provides a Good Framework for Creating a Final Comprehensive Transportation Plan

The existence of a draft long range transportation plan is of great benefit to the Commonwealth. We applaud the effort to look at transportation investment statewide and across modes in a comprehensive document. The draft plan is clearly the product of hard work and careful thinking. The document provides a valuable opportunity for transportation investments to be considered in a largely clear and transparent way. The extensive discussions of policy goals in this plan are similarly important, especially to the extent that they are actually used to guide transportation investment decisions.

We very much approve of several of the policy goals identified in the transportation plan. In addition to topics such as air quality, environmental justice, transportation demand management, aging, and bike and pedestrian access, we were pleased to see discussion of smart growth objectives throughout the document. Each topic represents a range of important elements that need to be woven into the selection, design, and implementation of all projects undertaken by the Commonwealth. As such, we

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Metropolitan Area Planning
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commend you for discussing these in the draft plan.

We applaud the Commonwealth for committing, in this draft plan, to paying for capital investments for transit expansion, relieving the MBTA of that burden. We also approve of the significant investment in transit projects generally and the prioritization of “fix-it-first” projects, especially with regard to roadway investments. Furthermore, we appreciate that the plan looks to innovative financing for transportation projects, but caution that the availability of outside funding should not be a sufficient reason for a project to move forward if that project fails to meet critical smart growth criteria.

In regard to project selection, we support the corridor planning concept suggested in the plan. We also support the continued use of objective criteria for project selection, though the definition and application of the criteria deserve significantly more attention than they have received to date.

B. More Details and Specific Strategies are Needed to Turn the Draft Framework into a Meaningful “Plan for Action”

1. Public Process

While we understand that a small number of meetings are being planned for September 2005 on the Draft Transportation Plan, a far more comprehensive public process is needed. It is essential that this process be a meaningful one through which public input will be utilized to inform the final transportation plan.

We firmly believe that robust public participation is a necessary part of a statewide planning process. The users of the transportation system, planning and transportation professionals, advocates and others who will be affected by this plan should have a forum for commenting on the plan. The public process needs to include some education and orientation for the general public to fully understand the complex nature of how projects move through the prioritization and funding processes.

Without public involvement and a plan for implementation the plan may be little more than an aspirational document with rhetoric about transportation investment goals and policies. More than anything else, it is the participation of the public in this planning process that will turn it into “A Plan for Action.” We strongly urge you to begin the public participation process that is promised in the draft plan. The credibility, vitality and longevity of the final transportation plan depend on the public’s participation in its creation. Strong public support can generate legislative support on Beacon Hill, increase the likelihood of necessary federal funding, and encourage municipal governments to play a positive role in the plan’s implementation.

A good first step would be to empanel a broadly-based advisory committee to review the plan in detail, discuss it with EOT and RTA staffs, and develop positive recommendations for areas of emphasis and improvement. This committee could also help design an effective community outreach and input process. Many of our organizations have already suggested such a committee in detailed prior comments. The committee should be staffed by independent professional analysts who can help it to do its work in a meaningful and detailed way. The small investment would be repaid many times by the increased base of support and enthusiasm that it could generate.

2. Corridor Analysis

While we agree that corridor analyses should be used in the transportation planning process, we feel that the draft transportation plan does not adequately describe what that corridor analysis should include and how it should be used. Corridor analysis could be a powerful tool to improve smart growth outcomes of transportation investments and should be developed with that goal at the forefront.

We strongly believe that corridor analysis must be completed in advance of any decisions regarding major transportation investments, both in the highway and transit

arenas. This should include proposed stations. If corridor analysis does not precede such decisions, it will be far less useful and may even be used inappropriately to justify decisions already made.

We recommend that, before analyzing individual project corridors, the state should identify priority areas for development where transportation investments should be focused. Priority areas should be those parts of the state where we want to encourage increased development. Once those priority areas are identified, a corridor analysis should be conducted to identify and prioritize appropriate transportation projects proposed in the selected areas.

Once priority areas are identified, corridor analyses for each project should both look within and beyond the transportation project corridor itself to put projects in the proper context. Each corridor analysis must include an evaluation of cumulative impacts from development, not just an analysis of the impacts of the single transportation project in the corridor. Additionally, corridor analyses should identify areas along the corridor where development should be clustered. Transportation project corridors should not be looked at as uniform swaths of land within priority development areas, but instead, specific locations should be identified where development should be focused along a corridor. In addition, corridor planning should focus development on grayfields and brownfields in order to increase efficiency of development, clean up sites and preserve open space where possible.

Preserving the increased capacity generated by transportation investments should be a critical objective of land use practices chosen for implementation through the corridor planning process.

We believe that it is essential that regional planning agencies be involved in the corridor planning process. They provide the necessary combination of transportation and land use expertise, and they have close ties with the municipal governments that will be called upon to implement most of the land use elements of the corridor plan once it is developed. The regional planning agencies should be provided with additional funding in order to facilitate their involvement.

Finally, the plan needs to describe how corridor planning requirements will be enforced. This detail, like many others, is missing from the draft transportation plan. We urge you to more fully describe the corridor analysis process for major transportation projects in the final transportation plan.

3. Financing the Plan

While we appreciate the attempt in the draft plan to outline a funding scheme for future transportation investments, the funding scheme identified raises several concerns.

If we are going to build the projects identified in this plan, additional revenue will be needed. The projected funding in this document falls short of providing sufficient funding for all of the projects identified. Furthermore, the plan relies on unrealistic financing expectations, such as success in every federal New Starts application. The Commonwealth needs to raise additional money itself to provide for state transportation needs. Transportation investment, and in particular transit investment, is just that – investment—and as such it brings returns far in excess of cost. The Commonwealth should view transportation projects in this light and commit to a significantly larger contribution and overall budget.

We enthusiastically applaud the Commonwealth for accepting responsibility for funding all future MBTA capital projects. With that said, it is vital that sufficient funding be provided to the MBTA, particularly so the Authority can aggressively chip away at its \$4 billion state of good repair backlog of projects. Other steps are also necessary to ensure that all of the Commonwealth's capital transit needs are met. These include both near term needs such as funding for the remaining CA/T obligation, adequate capital funding for RTAs other than the MBTA and improved rail freight service. Identifying

and providing sufficient funds will help long-needed transit projects finally move from the conception stage to operation.

As additional funding sources are considered, we ask that special attention be paid to value capture programs and the extent to which such programs may lead to resident displacement. While we support the value capturing techniques discussed in the draft plan and the suggestion of contributions from localities or private entities benefiting from infrastructure improvements, we are very concerned about the impacts such programs may have on affordable housing. Any value capture program must be structured to avoid exacerbating the increased housing costs and residential displacement that often result after major transportation investments. Specific plans for affordable housing preservation and development should be an objective of each corridor planning process that precedes a major transportation project.

Finally, it is our belief that additional funding mechanisms need to be identified and implemented promptly to ensure that all elements of the transportation plan, especially capital transit investments, are adequately funded.

4. Project Criteria

While the transportation plan does list project selection criteria, those criteria have not been amended to reflect the policy priorities in the transportation plan. The project selection criteria in the 20-Year Transportation Plan should be re-evaluated publicly to ensure that they are the optimum criteria that we can use to guide project selection and promote smart growth values.

We are also concerned that the draft transportation plan does not describe how the project selection criteria will be applied in the project selection process. A clear process for application of the project criteria should be described in the final transportation plan.

5. Geographic Fairness

The draft transportation plan clearly attempts to balance transportation investment across the state. Overall, this effort was successful, with the exception of the area between Route 128 and Route 495. There are areas between Route 128 and Route 495 with enough employment and population density to support transit, which are not adequately served by either the MBTA or any RTA. The needs of the communities in this region for both roadway and transit investments are not addressed in this plan. In order for the final transportation plan to be truly balanced, transportation investments between Route 128 and Route 495 must be included.

Similarly, the draft plan lacks a sufficient framework for investment for many of Massachusetts' medium and smaller sized cities. We are concerned that these areas may not actively pursue the planning and implementation of needed transit projects as a result of this deficiency in the draft plan.

6. Implementation of Policy Goals

There are several important policy goals which the draft plan mentions but about which no specific recommendations are made. Some of the important policy goals only mentioned in the plan include the promotion of public health and air quality improvements, equity and environmental justice improvements, transportation demand management implementation, and increased bicycle and pedestrian access. While we were pleased to see these issues mentioned in the draft plan, we believe that the final plan must include specific measures designed to achieve these goals. Furthermore, the plan fails to mention issues of race and transportation, which we feel should be addressed in the final plan.

7. Freight

The transportation plan fails to address pressing freight issues facing the

Commonwealth. Rail upgrades are needed to preserve existing freight rail services and to ensure the continuing vitality and growth of Boston's working port. If the Commonwealth fails to invest in our rail network and as a result, rail freight capacity is not preserved, freight activity will be forced to move to other modes. This will lead to serious air quality, safety, congestion and costly road deterioration impacts. Freight needs should be addressed in the final transportation plan.

C. Conclusion

In summary, while we believe that the draft transportation plan is a good beginning for a comprehensive state transportation planning process, work remains to be done. We hope you will take our comments into consideration and that a serious public process will begin shortly to allow many more members of the public to contribute to the creation of the final transportation plan.

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