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July 22, 2013

David Mohler
Chair, Transportation Planning and Programming Committee
Boston Region Metropolitan Planning Organization
10 Park Plaza, Suite 2150
Boston, MA 02116-3968

Dear Mr. Mohler:

We are grateful for the opportunity to offer comments on the Boston Region Metropolitan Planning Organization (MPO) revised draft 2014-2017 Transportation Improvement Program (TIP) and the proposed amendment to the Long-Range Transportation Plan (LRTP). Transportation for Massachusetts is a diverse, statewide coalition representing thousands of Bay State residents from Pittsfield to Provincetown. We are working together to create safe, affordable transportation choices for everyone in Massachusetts.

Reducing Greenhouse Gas Emissions

We thank the MPO for providing greenhouse gas (GHG) emission accounting data for many of the transportation projects under consideration. This data helps MPO members and the public understand the impact of our transportation investments on climate and, we hope, will play an important role in shaping the LRTP and TIP. Such consideration of the GHG impacts of particular transportation projects in the MPO's planning efforts is legally mandated and can help us achieve the greenhouse gas reductions required under the Global Warming Solutions Act and the Climate Plan.

We were therefore surprised that the proposed revision to the draft TIP is seeking to add the I-95/I-93 Canton Interchange Project. While no specific information about the increase in GHG emissions is provided for the 95/I-93 Canton Interchange Project, the most recent model results from the Central Transportation Planning Staff indicate that the proposed amendments overall would increase CO₂ by 12 tons per summer day by 2035 over the original LRTP. The Global Warming Solutions Act, however, requires a reduction of 25% by 2020 and 80% by 2050. The I-95/I-93 Canton Interchange Project clearly does not help the Commonwealth reach these important goals.

While this project might reduce congestion and travel times in the short term, the added capacity can be expected to be filled soon by drivers who are currently taking other routes or traveling at different times and those who shift from transit to driving, take longer trips, or decide to make a trip when they did not before. This phenomenon of induced traffic should be acknowledged in the modeling of the performance of this project and integrated into the evaluation of the GHG emissions expected from this project. **We request the climate emissions be modeled for the project, including a reasonable**



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estimate of induced traffic, and that data be provided to MPO members and the public, before any further action is taken on the interchange project.

Supporting Mode Shift Goal

MassDOT has set the ambitious goal of tripling the number of people that walk, bike and take transit. The interchange project, which will mostly benefit single occupancy vehicles, does not advance this goal. There are limited transportation dollars, and we should prioritize investments for multi-modal projects that advance MassDOT's mode shift goal.

Premature Project Selection

Our understanding is that the funding for the I-95/I-93 Canton Interchange Project would come from new transportation revenues. First, while we expect the bill will become law, it has not yet, and any action that assumes these new revenues is premature.

Second, there is insufficient funding to pay for all of the state's critical transportation projects. *The Way Forward* included many large-scale projects, including the interchange project, assuming new revenues averaging \$1.2 billion per year. But the legislature passed a bill that will dedicate an average of \$600 million per year to transportation. Transportation experts acknowledge that these new resources will allow us to make progress in addressing our infrastructure needs, but the funding is insufficient to simultaneously close operational budget needs, address the backlog of maintenance, and advance all of the projects in *The Way Forward*. The I-95/I-93 Canton Interchange Project is an expensive project, requiring an investment of an estimated \$238 million over five years.

The question needs to be asked, if we build the interchange, what *can't* we do? Projects must be carefully weighed against other priorities, not selected before our needs have been prioritized for the anticipated new funding.

The legislature designed a thoughtful prioritization process to guide the selection of projects to be funded by the anticipated new revenues. The pending bill establishes a commission to develop project selection criteria to prioritize spending these new funds. The MPO amendment would circumvent the legislature's intent and use a significant amount of the anticipated new revenue before a thorough vetting of all potential projects has been done.

MassDOT is also planning to develop a five-year capital plan to prioritize the state's transportation needs. The MPO's proposed amendment should be considered within the context of our state's overall capital plan.

Our Request

Massachusetts is poised to become a nationwide leader in our shared commitment to reducing our dependence on oil and our greenhouse gas emissions. The Governor and legislature have been working



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hard during this legislative session to bring in new revenues and design processes to make sure the funds are spent wisely and on our highest priorities.

It would be premature for the state to commit to a project of this magnitude without the overall plan in place. The MPO should not act until there has been a serious conversation identifying our collective highest priorities. Moreover, having the first project to be funded from the anticipated new revenues be the I-95/I-93 Canton Interchange Project signals that the MPO is stepping back from the state's commitment to reducing greenhouse gases and MassDOT's mode shift goals. We therefore urge you to oppose the proposed revision to the draft TIP and amendment to the LRTP.

Sincerely,

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George Bachrach



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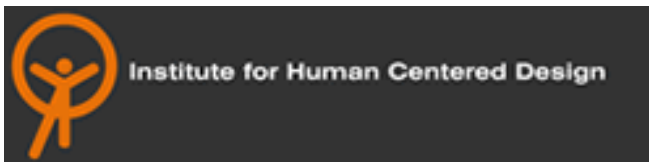
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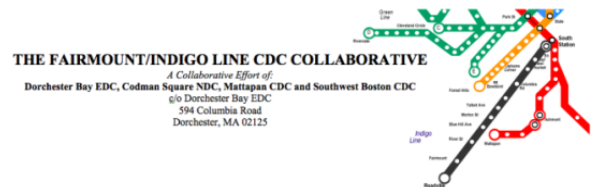
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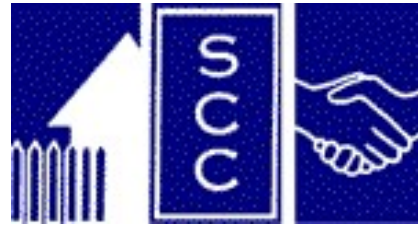


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