



495/METROWEST

PARTNERSHIP

Leaders for Regional Prosperity

May 27, 2010

David J. Mohler
Executive Director
Office of Transportation Planning
Massachusetts Department of Transportation
10 Park Plaza, Room 4150
Boston, MA 02116

Dear Mr. Mohler:

On behalf of the 495/MetroWest Partnership, we would like to offer formal commentary on the Massachusetts Department of Transportation's (MassDOT) Draft FFY 2011-2015 Highway Capital Investment Plan (CIP).

The 495/MetroWest Partnership is a non-profit advocacy organization serving thirty-two communities, over half a million residents and an employment base of \$17.7 billion, by addressing regional needs through public/private collaboration, and by enhancing economic vitality and quality of life while sustaining natural resources. The Partnership is concerned about regional constraints and limitations, and conducts numerous initiatives on workforce housing, brownfields, water resources, and transportation. Transportation constraints have been a consistent focus of our work, including the issue of toll equity leading up to the creation of MassDOT.

In light of the many Turnpike users from the 495/MetroWest region, most of our comments focus on the language regarding the Turnpike, both the Metropolitan Highway System (MHS) and the Western Turnpike. Also considering that much of this first five-year plan is predetermined by the existing Statewide Transportation Improvement Program (STIP), much of the new planning should involve the parts of the highway system not previously controlled by MassDOT, such as the Turnpike.

We are pleased by the inclusion of specific language reaffirming the intent of the MassDOT enabling legislation which honors toll equity concerns raised by the Partnership and others. In Chapter 3, under "Toll-Funded Facilities" (p. III-11), the draft plan states,

"The Transportation Reform Act requires that revenues collected on the Western Turnpike and Metropolitan Highway System, and Tobin Bridge must be spent only on the tolled system from where the revenue was raised."

We appreciate the fact that this is highlighted within the CIP in more than one chapter, however, subsequent language, in addition to monetary figures associated with the planned capital investment on the toll-funded facilities, raises significant concerns. Namely, the statement in Chapter 4 (on an unnumbered page), under the identical subsection title "Toll-Funded Facilities", which reads,

"The Commonwealth's toll-funded transportation facilities...can use only the revenue collected on those facilities to address capital needs."

While the law clearly limited the use of toll revenue to toll roads, the reverse is not true. We believe the legislation in no way states that facilities such as the Turnpike are only limited to toll revenues in terms of capital expenditures. In fact, it would seem that MassDOT ownership of such facilities would open these roads to federal funding which was previously inaccessible. Therefore, we strongly encourage you to remove such language from the final version of the CIP.

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We recognize that the Office of Transportation Planning is limited by existing plans such as the STIP and we understand that the STIP determines spending, not the CIP. However, considering that the existing STIP does not include toll-funded facilities now owned and operated by MassDOT, more attention should be given to the planning for those facilities within this draft document. The draft CIP does not reflect the integration of these facilities but rather inserts their previous plans under separate authorities into the document. More attention to the integration of toll-funded facilities into the MassDOT Highway System would be appreciated as the CIP is not required to be updated for another five years. The Turnpike and Tobin Bridge are an integral part of the MassDOT Highway System and should be reflected as such in the CIP.

We laud the CIP's inclusion, particularly in Chapter 4, of the funding shortfall both in terms of maintaining the existing system and for expansion and improvement projects. The Partnership has long recognized the transportation funding gap in the Commonwealth and in recent years has advocated for an increase in the gas tax as well as a move to direct road user fees to begin addressing the insufficiencies.

The Partnership appreciates the incorporation of the following language as a key component of the CIP:

"The distribution of funds and projects in the plan must ensure that not less than 75% of the annual percentage of the total statewide collections of motor vehicle fuel tax generated by each MassDOT highway district is spent in the district where generated, except that the minimum percentage is 85% in any district in which the revenue generated by registered vehicles that have a Fast Lane transponder exceeds the average revenue generated by such vehicles statewide."

This language was intended to address both regional and toll equity concerns. We would encourage transparency on how this requirement is implemented, with full disclosure on the methodology for tracking gas tax generation, Fast Lane transponder registrations, and ultimate distribution of funds and projects. We understand this is a difficult task but an important one to ensure regional equity and to address the unfair burden of Central Artery debt previously placed on tollpayers.

The Partnership recognizes that this is the first CIP drafted by the newly formed MassDOT and has noted the acknowledgment by the Office of Transportation Planning, within this document, that future plans will be more comprehensive as MassDOT further integrates its broad array of divisions and responsibilities. We agree with the vision laid out in chapter 5 of the draft CIP, specifically that "future iterations of the Capital Investment Plan will not only include additional segments of the highway system but also other modes of the overall transportation network, including transit, aviation, and rail." (p. V-1.) Only with a complete picture of the investment need across all modes can we fully understand the challenge ahead and advocate appropriately.

If there are any questions regarding our commentary on the draft CIP, please contact Jessica Strunkin at 774-760-0495, or by email at Jessica@495partnership.org. Thank you for your time and consideration.

Sincerely,



Paul F. Matthews
Executive Director



Jessica Strunkin
Deputy Director of Public Policy & Public Affairs