



Photo: The first Ciclovía, or open streets/cycle Sunday, was held in Lawrence in 2014. Photo: Groundwork Lawrence.

## Chapter 11

# Public Comments

The MVMPO appreciates the feedback we received from the public to make this plan more robust. The following pages include the original comment and suggestions received as well as either a response or the page where those changes can be found. The planning process is an on-going process and though the formal comment period has ended, the MVMPO will continue to seek input

from the public as we continue to provide planning services in the Merrimack Valley region to improve transportation and support our local, regional and state goals.

Comments on Draft 2016 MVMPO RTP  
7/13/2015

Submitted by: Joseph J Costanzo, Administrator,  
MVRTA

1. Page 28 Chapter 4

While the MVMPO RTP includes various public transit needs in this chapter and in other chapters the planning process undertaken by the MVRTA to produce its Regional Transit Plan includes service recommendations for FY 2016 through FY 2018 (pages 71-72). As stated on page 72 full implementation of these recommendations will increase total peak hour bus fleet requirements to 46 from the present 39. This will require the MVRTA transit bus fleet to expand to a total of 55 transit buses from the present 47. This total of 55 buses includes the FTA maximum spare bus ratio of 20% or 9 buses. Expanding the total bus fleet to 55 will maximize the storage capacity of the present MVRTA facility leaving no transit capacity beyond FY 2018.

2. Page 39 Objective 2

Incorrect reference: The MVRTA fleet includes 53 transit buses, 5 commuter buses and 17 vans.

Correct reference: The MVRTA fleet includes 47 transit buses, 11 commuter buses and 16 vans.

3. Page 64: There are no bike racks at the Costello Center as none were requested during the design phase of the project. The Buckley Center in Lawrence was built by the City of Lawrence and the Massachusetts Department of Public Works in 1982. The bus area is used by the MVRTA. There is no physical room for bike racks within the bus area.

4. Page 65 Table 7.2

Incorrect reference: Haverhill Intermodal Center and Lawrence Merrimack Street.

Correct reference: Haverhill MVRTA Intermodal Center, Granite Street and Lawrence MVRTA McGovern Transportation Center, Merrimack Street.

Under Park and Ride Lots:

Incorrect reference: Ballardvale Faith Lutheran Church

Correct reference: Andover Faith Lutheran Church.

5. Page 76

Replace similar incorrect references in Table 7.6 with the corrected references in Table 7.2.

6. Page 81 Merrimack Street and Downtown

Incorrect Reference: This PDA spans the Merrimack River and includes the entire downtown business district as well as the Merrimack Street business area. The area is served by the MBTA commuter rail station on Merrimack Street and the MVRTA's Buckley Transportation Center located on Common Street.

Correct Reference: This PDA spans the Merrimack River and includes the entire downtown business district as well as the Merrimack Street business area. The area is served by the McGovern Transportation Center, owned and operated by the MVRTA, which receives MBTA commuter rail, MVRTA Boston Commuter Bus and local bus Route 33 services. The Buckley Transportation Center located on Common Street is owned by the

City of Lawrence with the MVRTA occupying the ground floor Bus Area.

7. Page 93 Addressing Seasonal Traffic Congestion

Incorrect reference: The MVRTA is working with the City of Newburyport to institute a seasonal inner city circulator.

Correct Reference: Beginning on May 29, 2015 the MVRTA began providing a summer shuttle bus service within the City of Newburyport. The service operates on Friday, Saturday and Sunday and connects the commuter rail station with downtown Newburyport and Plum Island. The service will operate until Sunday September 6<sup>th</sup>.

8. Page 99 ITS for Transit

Add the following:

Upgraded bus/van communications system from analog based to digital based which will allow for implementation of real time bus/van location/arrival time information by FY 2017.

9. Page 124 LEP Language in the MVMPO Region

Incorrect reference: Notably, 35% of the MVRTA's bus/van operators, professional and administrative staff speak both English and Spanish.

Correct reference: Notably, 38% of the MVRTA's bus/van operators, professional and administrative staff speak both English and Spanish.

10. Page 143 Table 11.1

There were no transit projects taken from table 3.6, page 27. Implementation of these projects will accomplish MVMPO goals

**Response:**

**Table 7.5 was added to more clearly define the cost of implementing the Phases identified in the Regional Transit Plan and additional language explains that new garage facilities might be needed. All references were corrected and abbreviated where necessary in tables.**

**The statement that there are not bike racks at the Buckley and Costello Transportation Centers remains, simply because it was an observation.**

**All other suggested changes were made.**

Comments received from Nicolas Garcia, Federal Transit Administration on July 23, 2015

- Good description in the intro of how projects flow from RTP to TIP.
- Transit Financial Plan:
  - Please include in the projected available funds table ALL expected available funds, including state match.
  - It's not clear from the expenditures table which totals apply to which amounts, and which rows represent expenses and which represent costs.
  - Seems like the information is mostly all there, the formatting just needs a bit of work to make it clearer. At a quick glance, someone should be able to easily tell (a) how much transit will cost over the life of the plan, and (b) how much revenue is expected to be available to cover those costs, from all sources.
  - Also consider including a cost estimate of additional needs that are not currently met by projected funding sources.
- Could use some more description about how the list of transit projects is developed based on the recommendations and goals of the RTP. For example, the Mobility section

of the plan recommends some expanded and improved transit service--are these service expansions included in the estimated costs shown in the Financial Plan?

**Response:**

**The table was reformatted for clarity. A table was included in this section to show the proposed improvements that could be made if additional funds were found. The phased service changes were developed as part of the Regional Transit Plan process, which included public participation and service analysis. More information about the Phases is found in Chapter 7.**

Comments received from Kevin Wright, Federal Highway Administration – Massachusetts  
7/22/2015.

Please see FHWA's comments below on the 2016 Merrimack Valley RTP.

- Please ensure that all acronyms are defined at or before their first use.
- Page 15. Third Paragraph. Recommend including a statement at the end of the paragraph regarding the 80% federal / 20% match split for the available funding.
- Table 3.1. MPO should clearly show funds available for the region. Table heading is misleading. It is OK to show a statewide table for revenue projections, however the funds available to the MPO should clearly stand on its own. Include a table for the revenues available to the MPO.
- Chapter 3: Financial Constraint. Please include a discussion on the revenue projections and how they were developed. Yes, FHWA provides the revenue projections, but there should still be a discussion on their development.
- Chapter 3: Financial Constraint. The financial plan should contain a discussion of operations and maintenance commitments. Please include this discussion and demonstrate how these commitments tie in with the region's available funding.
- Chapter 6: Increase Safety for All Modes. The Plan should include a safety element that incorporates or summarizes the priorities, goals, countermeasures, or projects contained in the Strategic Highway Safety Plan (SHSP), as well as emergency relief and disaster preparedness plans and strategies/policies that support homeland security and safeguard the personal security of all motorized and non-motorized users. Please include a discussion of the SHSP and how the RTP is compatible with the SHSP.
- Table 7.1. This table shows a total of 39.51 miles of proposed ATN trails. However, Objective 1 on page 58 states that there are a total of 60.41 miles of proposed trail. Additionally, the first paragraph on page 61 states that there are 40.51 miles of planned trails. Please take another look at this section and ensure that all trail numbers are accurate.
- Chapter 9: Promote Environmental Sustainability. The Plan should include a

discussion of potential environmental mitigation activities and potential areas to carry out these strategies. Please include a more robust discussion of environmental mitigation strategies as well as a discussion of the MPO's consultation efforts with environmental and state resource agencies. The document should cover topics such as wetlands, park and recreation areas, endangered species, historic resources, etc.

**Response:**

**A more robust description of the SHSP as well as a section on security was inserted into Safety chapter. In addition, more description was provided in the Environmental Sustainability Chapter. All other recommended corrections were made.**

Comments from David Mohler, Executive Director of the Office of Transportation Planning, MassDot. Received 4:22 p.m. on Friday July 24, 2015:

General Comments:

- Please ensure that the document is in an accessible format.
- Please check the document for grammatical and writing errors.
- The MPO member list is missing in the document. Please consider using a chart to depict the MPO's organizational structure.
- The MVMPO Title VI compliance notice, endorsement, and the Self-Certification statement for RTP compliance with Global Warming Solutions Act (GWSA) pages are missing. These pages should appear in the beginning of the document.
- There is no executive summary in the document. Please develop one.
- The document does not include narrative on the transportation planning process. Please consider adding narrative discussing the responsibilities of participating agencies such as the Regional Transit Authority (RTA), federal partners, and MassDOT. In

the same chapter, the following should be added:

- The relationship between the TIP, UPWP, and RTP. Massachusetts state initiatives such as the weMove Massachusetts, Global Warming Solutions Act, GreenDOT, and the Healthy Transportation Compact
- Discussion on regional strategic plans that considers the areas of land use, economic development, housing, and environmental resources.
- Please ensure that all federal requirements, legislation, and programs are accurately reported.
- Please ensure that project names, the time bands in which they are anticipated to be programmed, funding amounts, and programs are accurately reported.
- Most maps in the document are illegible based on the way they are presented. They should be presented as separate pages instead of pasting them in as images.

**Response:**

- **MVMPO members have been added.**
- **All compliance and certification notices have been added.**
- **An Executive Summary was created.**
- **Responsibilities of all agencies are included in the MVMPO MOU which is included in the Appendices.**
- **A description of the TIP/UPWP/RTP is included.**
- **All other changes were made.**

Chapter 1: Introduction

- There is no mention of federal requirements and the performance based planning measures. The RTP must focus on performance based planning and the adopted vision, goals, and objectives must be in part guided by MAP-21 goals and objectives.

**Response: Change has been made.**

Chapter 2: Vision, Goals, and Objectives

- There is no mention of the fact that the vision, goals, and objectives for the Merrimack Valley MPO region have been updated to address recent legislation and to

reflect the needs and challenges facing the region.

- The vision statement and the performance measure targets for each goal is missing.
- Please provide a table describing the relationship between MVMPO's regional goals and MAP-21 planning factors.
- Please provide an overview of the RTP document. Explain briefly the contents of each chapter in the document.

**Response:**

- **A table was included which provides goals, objectives, strategies, targets and performance measures.**
- **An overview was included.**
- **All other changes were made.**

Chapter 3: Financial Constraint

- Page 16- Table 3.1-Please consider providing a brief narrative or bullet points explaining the assumptions on which the estimates are based.
- Please consider adding a table comparing the regions estimated highway project costs

versus available funding between the years of 2016-2040.

- Page 27- Table 3.6 - The font size is small and illegible. Please increase the font size.
- Please consider adding a table showing the anticipated MVRTA operating revenues and cost of service and a table showing MVRTA's capital expenditures versus capital revenues between years 2016-2040.

#### Chapter 4: Public Participation Process

- Please consider moving this chapter before chapter 3 (Financial Constraint).
- Please include MVMPO's public participation plan in an appendix. Was a public outreach plan (to guide the RTP public participation process) used during the development of the document?
- Please provide details on dates and locations of the public input sessions.

#### Response:

- **The endorsed Public Participation plan is included in Appendix E.**
- **The Public Participation Plan was used as the primary guide. New Table 3.1**

**provides a glimpse into how the MVMPO pursued outreach in member communities. Appendix F includes the full list of meetings with details.**

#### Chapter 5: State of Good Repair

- Table 5.2- The font size is small and illegible. Please increase the font size.
- For the set of established objectives, there is no mention of performance measure targets that the region anticipates to achieve.

#### Response:

**The Objective states: 80% of all federal aid-roads will be maintained at good to excellent condition. This is clear target. Additional clarification of targets for transit was included. No target was set for pedestrian infrastructure, but rather a strategy will be employed to create a baseline to begin measuring.**

#### Chapter 6: Increase Safety

- The safety issues and needs in the region are addressed in a good manner. The steps the region is undertaking to address this goal is documented well. However there is no reference to achievable targets on the

highway and transit side that is geared towards addressing this goal.

**Response:**

**A discussion of the targets was inserted into the chapter.**

Chapter 8: Economic Vitality

Objective 2 - Freight Movement

- Please consider providing a narrative discussing the key role that freight movement plays in the economic vitality and quality of life in the MVMPO region. Consider providing a list of freight related challenges the region is facing and explain how the new plan will address those issues.
- There is no mention of the national freight policy established under MAP-21.
- Table 8.3 should be updated to conform to the graphical format of the other data tables in the document for consistency.
- The chapter ends abruptly, please consider adding some conclusion language.

**Response:**

**A narrative discussing the role of freight movement in the region, the related**

**challenges and the MAP-21 national freight policy were included in the document. A conclusion was added to the end of the chapter.**

Chapter 9: Environmental Sustainability

- The chapter does not address livability concepts or explain how MVMPO will work towards creating livable communities.
- Please consider providing a map that shows the RTP projects and environmentally regulated areas in the region.
- Please consider including a discussion that explains whether the recommended list of projects has been reviewed to look at the potential impacts these projects might have on the terrestrial habitat. Please discuss if risk analysis was conducted for climate change and/or historic resources in the region.
- The air quality conformity determination narrative is missing from the chapter.
- There is no mention of quantifiable targets that address environmental sustainability goals.

**Response:**

- **A section on livability was added to the chapter.**
- **A map was created to show the relation of RTP project to environmentally regulated areas. Since the map is so detailed, it will be illegible in this document. Therefore, a hyperlink was created to access the map the MVPC web site.**
- **The narrative regarding air quality, which was provided by MassDOT, was included in the chapter under Objective 1: Improve Air Quality.**
- **Targets were inserted into the document.**

#### Chapter 10: Transportation Equity

- Please consider adding "Accessibility" to the chapter title.
- For the recommended projects in the plan, please consider explaining how the impacts on environmental justice and low income areas are identified and/or considered.

#### **Response:**

**Accessibility was added to the chapter title and an explanation about how impacts on EJ**

**and low income communities were identified.**

#### Chapter 11: Summary

- Please consider adding a table listing the status of the recommended projects in the 2012 RTP.
- Since this is the summary chapter, please include a list of projects being recommended in the draft plan and please detail the relevant time band for each project.
- Please consider adding a table with recommended projects without an identified funding source.
- Please add language that would describe how the recommended projects would assist the MPO in achieving the vision, goals and objectives of the RTP.

#### **Response:**

- **Table 11.1 was added to summarize the status of 2012 RTP projects.**
- **Table 11.2 provides a summary of those projects which are identified for funding through the MPO, statewide funding, and those which do not have identified funding. Specific funding information can**

**be found in the financial constraint chapter.**

Comments from Rafael Mares of the Conservation Law Foundation. Received 3:42 p.m. on Thursday, July 23, 2015:

- CLF requests that the MPO return to its previous practice of conducting a conformity analysis for ozone as required by the federal Clean Air Act (CAA).

**Response: It is MassDOT’s position that air quality conformity determinations to the 1997 Ozone NAAQS are no longer required. However, MassDOT has committed to the following:**

**In consideration of the comments received, combined with MassDOT’s greenhouse gas (GHG) reporting requirements for the Commonwealth’s Global Warming Solutions Act (310 CMR 60.05), MassDOT will conduct a “conformity-related” emissions analysis for ozone precursors, consistent with the 1997 NAAQS standards (currently superseded by the 2008 NAAQS). This emissions analysis will be for informational purposes only (as it is**

**currently NOT federally required), and will be contained in a separate air quality document (also to include GHG emissions analysis) that will be completed at the end of August 2015 – the results of which will then be available to the MPOs, the Massachusetts Executive Office of Energy and Environmental Affairs (and affiliate agencies), and all other interested parties.**

Comments received from Mark Spencer, Andover.

A group of Andover citizens, in close cooperation with Andover’s planning and conservation departments, have been working for a year to revitalize the town’s efforts to construct a Greenway along the Shawsheen River. It has been a goal of the town for decades but lacked momentum in the past. At Town Meeting this past April we passed an article approving a new zoning overlay for our historic mill district including the section of the Shawsheen River in our downtown.

In the year that our committee has operated we have received broad support by a coalition of businesses, conservation and recreation groups, and town leadership. In particular, we have made great progress getting the blessings of property owners whose land borders the river. We have

also reached across the Merrimack River to explore the great success in Lawrence of the Spicket River Greenway and will sustain discussion with the neighboring communities.

During discussions with Betsy and Heather we learned that the Shawsheen River Greenway is identified in the draft Regional Transportation Plan. This is welcome news and we wanted to share our support and update you on the growing support in our community. I have two questions:

- I skimmed through the 2016 draft plan and could not find mention of the Shawsheen River in Andover. Can you tell me where I missed it or let us know what those plans are?
- How can we be part of the planning so that our efforts coordinate with your larger ones?

We'd be happy to meet with you. Let us know if that's a possibility.

**Response:**

**The Shawsheen River Greenway appears in the Mobility Chapter 7 – Creating a Multi-modal Transportation System. At this time, funding was not identified for this project, but the MVMPO will consider funding this project when funding becomes available.**

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