



# APPENDIX





## Appendix – Comments and Responses to RTP

### Introduction

The Draft Montachusett Regional Transportation Plan (RTP) was out for a 30 day public review and comment period that ran from June 22, 2015 until July 21, 2015. During that time, comments were received from MassDOT, the Federal Highway Administration (FHWA), Cross Town Connect and the Federal Transit Administration (FTA). All comments were reviewed and various levels of responses were made that are reflected in the MPO Endorsed RTP. The following is a summary of those comments and their applicable response.

### MassDOT Comment Letter on 2016 Montachusett RTP

The following is a point by point listing of the comments received from MassDOT along with the MRPC perspective on the type of comment it represents.

#### General Comments:

1. Please be sure to relate content of the chapters to the vision of transportation planning for the region, which should be aligned with MassDOT and U.S.DOT transportation policy priorities. Many chapters appear as summaries of the current state of transportation. This document is intended to help shape the goals of planning for the region over the next twenty years and this objective is largely absent.
  - **Updates/Revisions made to clarify and address.**
2. Please reformat the document to read as one consistent report as opposed to individually composed sections. Currently, there is an absence of parallel structure between chapters, and in some cases, within chapters. The format should be consistent and predictable for improved readability and transparency.
  - **Formatting/Style Issue addressed.**
3. In an effort to keep chapters concise and user-friendly, consider limiting use of charts and tables to depict only relevant, significant information. Be sure there is narrative to accompany charts and graphs. This will help make the document accessible as well as provide context.
  - **Formatting/Style Issue addressed.**
4. Please use consistent formatting for charts and graphs in terms of color, font, etc, and use proper labelling.
  - **Formatting/Style Issue addressed.**
5. Please use consistent formatting for chapters with references to goals and objectives, relevant projects, and the region's overall vision.
  - **Formatting/Style Issue addressed.**
6. Please consider adding a Glossary of Terms and an Appendix to condense chapters.
  - **Content Issue. Will examine.**
7. Please use the most current data and maintain consistency when showing year comparisons in charts and graphs. For instance, the Demographics chapter includes a mix of 2000 and 2010 census data and uses a variety of baseline years.
  - **Content/Wording/Style Issue reviewed.**



8. Please include appropriate introductions and conclusions in all chapters, so that readers can gain an understanding of the material being presented.
  - **Content/Wording/Style Issue reviewed.**
9. Please be sure all chapters address the specific implications for transportation planning in the Montachusett region. Narrative often makes statements that demonstrate no relationship to transportation and therefore undermines the presentation of information.
  - **Clarification conducted. Updates made.**
10. Please provide an Executive Summary.
  - **Update made.**
11. Please add Chapter 1. There should be an introduction to the document, providing an overview of what the document is and why it is important.
  - **Update made.**

Goals and Objectives Chapter:

12. In the vision statement, please revise "citizens" to either "people" or "individuals."
  - **Formatting/Style Issue addressed.**
13. Please provide narrative with references to MAP-21, performance-based planning requirements, and explanation for why performance measures, and these particular performance measures, are important for the region.
  - **Update made.**
14. Please write goals as actionable statements rather than general categories.
  - **Formatting/Style Issue addressed. Prior statements change to shorter draft version based upon MPO Chair comments in early 2015.**
15. Please reformat to merge metrics with goals and objectives rather than separating into a measures section. It appears duplicative.
  - **Formatting/Style Issue addressed.**

Public Outreach Chapter:

16. Please summarize all tables and survey results to highlight particularly relevant and interesting findings. All other findings should be placed in an Appendix.
  - **Formatting/Style Issue. Content left as presented.**
17. Page 6: "Spanish advocates" is an inaccurate reference, as it refers to advocates of the Spanish language. Please revise so that it is understood that staff reached out to transportation users who speak Spanish.
  - **Content/Wording/Style Issue addressed.**
18. Please relate survey results to identified vision, goals, objectives, and investments identified.
  - **Clarification Needed. Updates made.**

Demographics (Regional Profile) Chapter:

19. Overall, this chapter lacks substance in regards to the relationship between demography and transportation. The lack of substance undermines the purpose of this document to determine a vision, goals, and objectives for the region based in part on trends and characteristics experienced in the region. Please illustrate the connection between current/changing demographics and transportation planning priorities.
  - **Updates/Revisions made to clarify and address.**



20. Refer to and incorporate the Coordinated Health and Human Services Transportation Plan where appropriate. Please re-evaluate use of charts and graphs. Many tables are unlabeled; use inappropriate intervals, or present superfluous complex information.
  - **Updates/Revisions made to clarify and address.**
21. Please re-evaluate use of charts and graphs. Many tables are unlabeled; use inappropriate intervals, or present superfluous complex information.
  - **Content Issue. Will examine.**
22. Page 1: Please strike "brief profile" as this is a 54-page chapter
  - **Formatting/Style Issue addressed.**
23. Page 1 Paragraph 2: Please add "... and the relationship to transportation needs of the region."
  - **Content/Wording/Style Issue addressed.**
24. Page 2: Please use most recent available data. Unemployment data should be available more recently than 2012.
  - **Content/Wording/Style Issue addressed.**
25. Page 9 Table 3: Please show percent change in population.
  - **Content/Wording/Style Issue addressed.**
26. Page 10 Figure 3: Please consider condensing age brackets and adding a side by side comparison year to show change in population. Using this graph, it is possible to show mobility dependent populations (youth) and mobility "insecure" populations (aging and elderly), which may reveal unique transportation needs for your region.
  - **Content/Wording/Style Issue reviewed.**
27. Page 14 Figure 4: Please consider connecting this graph to journey to work data and age data to show relationships and increase relevance of data.
  - **Content/Wording/Style Issue reviewed. Updates made.**
28. Race/Minority: Please begin this section with a definition of race and minority categories. Beginning the section with the phrase "the nonwhite population" is misleading without clear definitions.
  - **Content/Wording/Style Issue. Updates made.**
29. Language: Please reorganize this section to discuss the LEP Plan at the beginning of the section rather than the end. Relate narrative to LEP Plan work and efforts.
  - **Content/Wording/Style Issue reviewed.**
30. Income: Include narrative discussing the transportation implications for a region that contains communities with drastically different income levels. How does this uniquely shape your regions goals and priorities?
  - **Content/Wording/Style Issue. Updates made.**
31. Income: Please make sure that tables account for inflation to accurately portray income data.
  - **Content/Wording/Style Issue reviewed.**
32. Poverty/Low Income: Please consider setting a low-income threshold for the region rather than relying on federal poverty data that inaccurately reflects the cost of living in Massachusetts.
  - **Content/Wording/Style Issue reviewed. Potential future work effort.**
33. Page 37: Please use 2014 unemployment data if available. Page two states that the regional peak of unemployment was 9.9% but the table and graph on this page do not reflect that statement.
  - **Clarification conducted. Updates made.**



34. Page 38 Figure 7: This graph shows there has only been growth in "off schedule" commute patterns. Please provide narrative discussing this finding and the implications.
  - **Content/Wording/Style Issue reviewed. Updates made to reflect.**
35. Page 39 Table 24: Please revise the format of this table. Currently, it is misleading and looks as if there is a 30% graduation rate in the region. Data should be shown cumulatively, if this table is necessary at all.
  - **Content/Wording/Style Issue. Updates made to clarify.**
36. Mean Travel Time: Please revise this section. A 36 second increase in travel time since 2000 is not significant enough to report, Consider discussing possible causes to unchanged travel time, such as an older population that is no longer commuting or impacts of the Fitchburg commuter rail improvements.
  - **Clarification conducted. Updates made to address.**

#### Equity Chapter:

37. Introduction: Please clarify which categories are protected under Environmental Justice and which are protected under Title VI. Please include sex as a category covered under FHWA's Title VI program.
  - **Update made.**
38. Target Populations: Please replace "disabled" with "individuals with disabilities."
  - **Content/Wording/Style Issue addressed.**
39. Target Communities: Please clarify the justification for defining target communities as communities that exceed the regional average for **two or more** target populations. Categories are protected under the law on an individual basis, so the logic behind this analytic decision must be clearly stated.
  - **Update made. Clarifications/Revisions made.**
40. Please include reference to all Title VI protected categories, including sex. Even if there is not enough statistical significance to merit a full analysis, all categories must be acknowledged and discussed.
  - **Update made.**
41. Please consider including a map of the region to assist this chapter.
  - **Content/Wording/Style Issue addressed.**
42. Please further clarify benefits and burdens, as investment does not necessarily equate to benefitting a community.
  - **Update made. Clarifications/Revisions made.**
43. Please include a discussion of transit equity implications.
  - **Update made. Clarifications/Revisions made.**
44. Please connect this chapter to the Coordinated Health and Human Services Transportation Plan where appropriate.
  - **Update made. Clarifications/Revisions made.**

#### Highway Systems Chapter:

45. Please reorganize this chapter. Currently, it serves as a summary of existing highway systems with an extensive discussion of roadway classifications that lacks a connection to determining federal-aid eligible roads.
  - **Content/Wording/Style Issue reviewed.**
46. Please consider moving discussion of traffic counts to Congestion chapter.
  - **Content/Wording/Style Issue reviewed.**



Infrastructure Chapter:

- 47. page2: Please revise graph to show as a stacked bar graph and add a title and appropriate labels.
  - **Content/Wording/Style Issue reviewed.**
- 48. Please make sure all tables are legible
  - **Formatting/Style Issue addressed.**
- 49. Pavement Management At MRPC: Please revise "The principle intention of having a pavement management program at MRPC is for the purpose of including the data in our transportation evaluation criteria (TEC)." This is an inaccurate and misleading statement, as a pavement management system should provide far more utility than to simply inform project scoring. Rather than, "at MRPC," please refer to "the MPO staff."
  - **Update/Revisions made.**

Congestion Chapter:

- 50. Please clarify if the MPO has assisted the City of Fitchburg in advancing a CMAQ project that would address the signals discussed.
  - **Clarification addressed.**
- 51. Please include a discussion of Route 2, as this is a major connector to the rest of the state,
  - **Clarification addressed.**
- 52. Please provide a discussion of what role transit plays in providing connections and affecting congestion.
  - **Clarification addressed.**

Bicycle & Pedestrian Chapter:

- 53. Please include page numbers.
  - **Formatting/Style Issue addressed.**
- 54. Please replace references to "alternate modes of transportation" with terms such as "modal options," "mode shift," "multi-modal," "mode choice," "healthy transportation."
  - **Content/Wording/Style Issue addressed.**
- 55. Please strike reference to Executive Office of Transportation (EOT) on page one, as EOT has not existed for nearly six years.
  - **Content/Wording/Style Issue addressed.**
- 56. Please consider using the unique format of this chapter as a template for other chapters.
  - **Formatting/Style Issue addressed.**

Safety Chapter:

- 57. Please make sure all tables are legible.
  - **Formatting/Style Issue addressed.**
- 58. Page 2: Please revise the section title "The MassDOT 2010-2012 Top 200 Intersection Locations Report" to accurately reflect the report title. Relate findings of report to your region's plan.
  - **Content/Wording/Style Issue addressed.**
- 59. Page 8: Please revise this analysis, as it currently lacks a reflection of where safety improvements have been made in the last ten years.
  - **Clarifications/Revisions made.**
- 60. Table 4 Page 13: Please consider another way to present this information that is easier to read.
  - **Formatting/Style Issue reviewed.**
- 61. Page 18 Analysis within EJ Areas: Please clarify this analysis further. Specify that injury crashes affected EJ communities the most out of Fatal, Injury, and Property damage crashes. When discussing negative impacts, this should be in relation to EJ areas vis-a-vis non-EJ areas.



- **Clarifications/Revisions made.**

62. Please revise chapter formatting, as it is difficult to read and draw conclusions.

- **Formatting/Style Issue addressed.**

Transit Chapter:

63. Please include a map in the introduction, rather than a listing of every member community in text.

- **Content/Wording/Style Issue addressed.**

64. Please include maps depicting transit service, including MART and MBTA.

- **Content/Wording/Style Issue addressed.**

65. Please replace references to "the disabled" with "individuals with disabilities."

- **Content/Wording/Style Issue addressed.**

66. Page 17: Please refer to MBTA blue book statistics to substantiate the narrative.

- **Formatting/Style Issue reviewed.**

67. Please maintain formatting consistency throughout chapter. Consider reformatting chapter so it is more readable and connected to MassDOT and U.S. DOT policy priorities.

- **Formatting/Style Issue reviewed.**

Environment & Climate Change Chapter:

68. Please provide references for all direct quotes.

- **Formatting/Style Issue addressed.**

69. Page 5 Multi-Modal Corridors: Please replace "led to global climate change" with "contributed to global climate change."

- **Content/Wording/Style Issue addressed.**

70. Please provide a connection between dams and transportation, if dams are to be included as a discussion point.

- **Update/Revision made.**

Challenges and Recommendations Chapter:

71. Please reformat chapter as current layout is not conducive to readability

- **Formatting/Style Issue addressed.**

72. Please strengthen the recommendations as actionable plans or projects that reinforce the goals of the region, incorporate MassDOT and U.S.DOT policy priorities, and show a synthesis between the TIP, UPWP, and the overarching vision of the RTP.

- **Update/Revision made.**

73. Please consider moving this chapter to follow vision and goals or public participation, rather than at the end of the document.

- **Content/Wording/Style Issue reviewed.**

Financial Chapter:

74. Page 1: Please replace "NHS with "National Highway System (NHS)."

- **Content/Wording/Style Issue addressed.**

75. Conclusion: Please reconsider the phrase "the Total Available funds for the 2016 - 2040 years ... exceeds the total Financial Needs for the 2016-2040 years ..." as this indicates that the region is receiving enough funds to address all transportation issues within the region, unless this is the actual message of the MPO.

- **Update/ Revision made.**

76. Please provide a concluding chapter to complete the document

- **Content/Wording/Style Issue reviewed.**





## FHWA Comment Letter on 2016 Montachusett RTP

1. In addition to number of fatalities and serious injuries, MAP-21 also calls for measures of the rates of fatalities and serious injuries.
  - **Performance measures revised to account for fatalities and serious injuries.**
2. Was there a public meeting held during the comment period? (If so, be sure to document it in the RTP.)
  - **Additional information added regarding recent public presentation of RTP on July 15, 2015.**
3. The equity analysis should be based on impacts of the proposed projects included in the RTP, not just on past TIPs. Also, please explain why equity analysis was for areas that exceeded regional average for 2 or more criteria (minority, LEP, etc)?
  - **Equity analysis expanded to include RTP recommended projects.**
4. The RTP should include a discussion of the types of potential environmental mitigation activities, including activities that may have the greatest potential to restore and maintain the environmental functions affected by the RTP; the discussion should be developed in consultation with Federal, State, and Tribal land management, wildlife, and regulatory agencies. The discussion may focus on policies, programs, or strategies, rather than at the project level.
  - **Environmental sections updated to address.**
5. In general, the RTP should include documentation that describes MPO's consultation efforts with appropriate State and local agencies responsible for land use management, natural resources, environmental protection, conservation, and historic preservation concerning the development of the Plan.
  - **Updates incorporated as indicated.**
6. Financial plan:
  - What is the NFA preservation funding that is assumed at ~\$22 million for each 5 year time band- is this Chapter 90 or something else? Please be sure all anticipated revenues are clearly explained.
    - **These figures were derived from MassDOT financial data that was provided in April/May.**
  - Pavement and bridge maintenance sections seem to assume that no further deterioration occurs over the life of the RTP (or if that is accounted for, it is not described how). The discussion appears to indicate that it will take the majority of the MPO's target funds over 20+ years to address the current needs (for pavement); how will the other maintenance and operations needs that arise during the life of the RTP be addressed? Furthermore, many of the tables in this section are confusing, and it is unclear as to where the numbers are coming from.
    - **Chapter conclusions updated to reflect.**
  - The RTP seems to indicate that the MPO will fund the five identified "major infrastructure" projects out of the "statewide" pots of FHWA funds. MassDOT typically selects projects for these funds, so please provide discussion of the State's agreement with this funding arrangement for the identified projects.
    - **Chapter conclusions updated to reflect and clarify issue.**
  - Route 2 Expansion project should only be split over two time bands if it is to be done in separate phases. Please clarify.



- **Discussion of Rt 2 Expansion project updated.**
- P 10- Remaining Regional Needs: No cost estimates are provided for any other non-transit projects besides the major infrastructure projects. It is unclear how the recommendations from the RTP fit into the funding split proposed for target funds based on past expenditure patterns. Discuss how target funds will be sufficient (or not) to implement the Plan's recommendations.
- **Discussion Remaining Regional Needs updated.**
- Where do the funding needs dollar figures come from for statewide programs (page 13)?
- **Derived from MassDOT Financial Tables provided for the RTP.**

### Additional Points of Clarification from FHWA

1. Via phone and email – Question regarding RTP recommended projects and ability to maintain fiscal constraint based upon MPO Discretionary funding over the life of the RTP. Year of Expenditure (YOE) costs of projects need to be addressed.
  - **Analysis conducted of projects versus anticipated year and YOE calculation. Project costs grouped in to five year bands with anticipated Discretionary Funding. Results indicate that projects can be implemented within RTP time frame and fiscal constraint can be maintained.**

Analysis Results of RTP Recommended Projects

TOTAL AVAILABLE FUNDING	2020	2021-25	2026-30	2031-35	2036-40	2020-2040
MPO Funding (Discretionary Funding)	\$9,613,783	\$48,249,186	\$60,292,381	\$68,270,644	\$73,546,873	\$259,972,867
Safety	\$672,965	\$3,377,443	\$4,220,467	\$4,778,945	\$5,148,281	\$18,198,101
Intersections Improvements	\$384,551	\$1,929,967	\$2,411,695	\$2,730,826	\$2,941,875	\$10,398,915
Maintenance	\$6,729,648	\$33,774,430	\$42,204,667	\$47,789,451	\$51,482,811	\$181,981,007
Congestion	\$961,378	\$4,824,919	\$6,029,238	\$6,827,064	\$7,354,687	\$25,997,287
Pedestrian/Bicycle	\$96,138	\$482,492	\$602,924	\$682,706	\$735,469	\$2,599,729
Air Quality Related	\$288,413	\$1,447,476	\$1,808,771	\$2,048,119	\$2,206,406	\$7,799,186
Other	\$480,689	\$2,412,459	\$3,014,619	\$3,413,532	\$3,677,344	\$12,998,643
RTP RECOMMENDED PROJECTS EST COSTS	\$9,338,000	\$47,157,896	\$59,411,042	\$66,557,354	\$66,396,602	\$248,860,894
DIFFERENCE	\$275,783	\$1,091,290	\$881,339	\$1,713,290	\$7,150,271	\$11,111,973

### Follow-up email comments

1. Provide an explanation of why the TIP projects and the first 4 years are not included or perhaps include the 2016-2019 TIP projects in the recommended list.
  - ***TIP projects not included as assumed to be part of TIP fiscal constraint. The 2020 year used as starting point as it is currently first year within RTP where priorities have not been established as of yet.***
2. Were the projects prioritized with specific projects allocated to each time band? If so, please add that information either to Table 16-11 or elsewhere. If not, include a narrative explanation of how the needs were distributed for the purposes of this analysis.
  - ***Projects prioritized based on attempt at geographical equity with emphasis on safety as first consideration.***
3. Did you inflate projects to the mid-year of future time bands? Please be sure an explanation of the 4% YOE application is included.
  - ***All projects were adjusted for an anticipated YOE and then costs were summarized by appropriate five year time bands.***
  - ***Chapter to be updated to reflect comments.***

### CrossTown Connect Comment Letter on 2016 Montachusett RTP



CrossTown Connect, Transportation Management Association

Phone 978-929-6457 Fax 978-929-6348 <http://www.crosstown-connect.org>  
12 Clock Tower Place, Suite 260 G, Maynard, MA 01754

July 17, 2015

Brad Harris  
Transportation Project Director  
1472R Water Street  
Fitchburg, MA 01420

RE: Montachusett Regional Planning Commission's (MRPC) Transportation Planning Process

Dear Mr. Harris,

On behalf of CrossTown Connect Transportation Management Association (TMA), please accept the following comments regarding the MRPC transportation planning process.

CrossTown Connect TMA is a Public Private Partnership (PPP) between the communities of Acton, Boxborough, Littleton, Maynard, and Westford and businesses located in the region. The TMA is a formal structure for collaboration focused on reducing traffic congestion and air pollution while increasing mobility and commuting options. CrossTown Connect works both with communities to address transportation concerns and increase economic development opportunities and with employers to provide their employees with commuter services that promote a wider range of options for getting to and from work.



Two of our member communities, Boxborough and Littleton, are included in the MRPC sphere of influence and are affected by this plan. While these communities are within MART's area, they are located on the periphery, and have limited transportation choices. We would urge MRPC to consider connectivity

and cross-boundary connections to other RTA's and systems in its planning process so as to be as inclusive as possible to communities that lie "between" RTA's and to encourage respective systems to bolster and work in synergy with each other.

As the entity that provides central dispatching services for Councils on Aging (CoA's) in Acton, Boxborough, Littleton, and Maynard, CrossTown Connect is a strong supporter of MRPC's goal of creating more flexibility in the use of Council on Aging vehicles. Enabling these vehicles to be utilized to serve other segments of the local population while not impinging upon the intended users' access will help to efficiently provide more service to more people with the assets that are already available to us.

One of the major assets that the CrossTown Connect region has is the upgraded Fitchburg Commuter Rail line and the newly renovated Littleton/495 Station. While this station provides many opportunities, it also presents the challenge of constrained and over capacity parking facilities. We support MRPC's recommendation to conduct a study weighing various options and scenarios for increasing parking at this station. We also support advocating for more peak-time outbound trains to create a viable reverse commute for talented workers from the Boston area. An increase in both service and parking capacity will contribute to higher Commuter Rail ridership to and from Littleton/495 Station, less congestion, better mobility, lower emissions, and new economic development opportunities throughout the region.

While we applaud MRPC for identifying the need for shuttle service between Littleton/495 Station and employment/residential centers and we understand the constrained budget within which MRPC operates, we are nevertheless concerned that the updated TIP does not fund any such service. Shuttle service from this station would again lead to the benefits mentioned above and incentivize millennials who are increasingly less automobile-dependent to consider living closer to their employers in the region.

As development continues to accelerate in the 495 corridor, we highlight the need to focus on innovative, collaborative, and cross-jurisdictional approaches to transportation, mobility, and economic development challenges in order to insure that the region functions as a whole that is more than the sum of its parts.

We thank you for your consideration of our comments on the planning process of the Montachusett Regional Planning Commission.

Sincerely,

Scott Zadakis  
Executive Director

### MassDOT Response to CLF Comment Letter on 2016 RTP's

All the Massachusetts MPOs and MassDOT continue to meet the requirements of air quality conformity according to the Code of Federal Regulations, and as evaluated through inter-agency consultation. Specifically:



On March 6, 2015, (80 FR 12264, effective April 6, 2015) EPA published the Final Rulemaking, “Implementation of the 2008 National Ambient Air Quality Standards (NAAQS) for Ozone: State Implementation Plan Requirements; Final Rule.” This rulemaking removed transportation conformity to the 1997 Ozone NAAQS (the standard referenced by CLF and the subject of a 12/23/14 DC Circuit Court decision).

Link to Final EPA Rulemaking: <http://www.gpo.gov/fdsys/pkg/FR-2015-03-06/pdf/2015-04012.pdf>

Since the RTPs have been developed, reviewed, and will be approved after April 6, 2015, air quality conformity determinations to the 1997 Ozone NAAQS are no longer required, as those standards and all associated area designations have been permanently replaced by the 2008 NAAQS, which (with actually a stricter level of allowable ozone concentration than the 1997 standards) no longer designate Massachusetts as a non-attainment area(s) for ozone (except for Dukes County – see below).

Through the Interagency air quality consultation process (involving U.S. DOT, EPA, MassDEP, MassDOT, and the MPOs) the latest EPA rulemakings, the referenced court decision, ozone standards and area designations were all reviewed. Specific transportation conformity requirements in Massachusetts for this RTP round are as follows:

- No conformity determination is required for the 2008 Ozone NAAQS, as Dukes County (the only designated non-attainment area) is classified as an “isolated rural nonattainment area” and therefore only needs to evaluate transportation conformity when the Martha Vineyard Commission has a “regionally significant” project that would trigger conformity.
- The Boston carbon monoxide attainment area with a current maintenance plan in place (with a carbon monoxide motor vehicle emission budget) will prepare a carbon monoxide air quality analysis for the Boston Area (nine communities).
- The Lowell, Waltham, Worcester and Springfield Areas are classified attainment with a limited maintenance plan in place. No regional air quality analysis is required in limited maintenance plan areas as emissions may be treated as essentially not constraining for the length of the maintenance period because it is unreasonable to expect that such areas will experience so much growth in that period that a violation of the carbon monoxide NAAQS would result. Therefore, in areas with approved limited maintenance plans, Federal actions requiring conformity determinations under the transportation conformity rule are considered to satisfy the “budget test.” All other transportation conformity requirements under 40 CFR 93.109(b) continue to apply in limited maintenance areas, including project level conformity determinations based on carbon monoxide hot spot analyses under 40 CFR 93.116.

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.



## FTA Comment Letter on 2016 Montachusett RTP

Comments on Montachusett MPO RTP:

1. I appreciate the update on transit improvements made since the last plan. It might be interesting to note which of these improvements were called for in the plan.
  - **Updates made to indicate as requested.**
2. Chapter 16 (Finances): I'm a bit confused about the transit available funding tables--the narrative mentions state funding sources, but the tables appear to only list federal sources. Please update the tables to include state, federal, local, and any other sources of revenue.
  - **Discussion with RTA. Will update as appropriate.**
3. Excellent public outreach section--including the results of both meetings and surveys is a good practice.
  - **Noted.**
4. Good demographic analysis.
  - **Noted.**
5. Transportation Equity section is very useful.
  - **Noted.**

