

# Appendix C

## Comments

## 1. Massachusetts Department of Transportation (MassDOT) Comments and Responses

Comments from MassDOT Office of Transportation Planning		
Completeness		
Review Item	Comments	MPO Response
MPO self certification statement is included.	Please include a self certification statement for endorsement.	Certification Added
GHG certification is included.	Please include a GHG certification statement for endorsement.	Certification Added
Charts, tables, and maps are legible and properly annotated.	Please provide a legend to help readers with Figure 4.7-2 and Figure 4.7-4 to clarify what the colors represent. In Ch 4.9, some of the question figures do not appear to match the corresponding narrative, such as Question 5. Please double check to make sure the narratives are next to the appropriate questions and figures.	Clarification added, corrections made
Document is available in relevant languages per the MPO's Title VI Plan.	Please include the "Notice of Nondiscrimination Rights and Protections to Beneficiaries" before beginning the narrative.	Notice added
List of MPO members is current.	Please include a list of MPO signatories. This can be copied directly from the TIP document.	List of signatories added
Signatory sheet is included and accurate. Update Gina Fiandaca as Secretary/CEO of MassDOT.	Please include a signatory sheet for endorsement of the RTP.	Endorsement sheet added
Acronyms and partner agency lists are up to date.	Please include an acronyms list in the appendix. This can be directly from the TIP and UPWP.	Added to appendix
Narrative		
Review Item	Comments	MPO Response
RTP outlines MPO institutional organization.	Please consider including a brief description of the MPO organization. This can be pulled directly from the UPWP.	Description added
RTP links to BIL planning emphasis areas.	Please add the BIL Planning Emphasis Areas in Chapter 3 where appropriate.	Content added
RTP discusses evaluation scoring.	Please consider including, or providing a link to, the TEC discussed in Chapter 3.	Content added
RTP references projects that are considered to be regionally significant. <b>If RTP lists "regionally significant" projects in a financially constrained manner, please notify the Manager of MPO Activities.</b>	Please include the statement from the 'GHG Results for GWSA - FFY 2024 RTPs' in the Air Quality Conformity chapter as well. Document attached via email for reference.	Statement added
RTP describes funding sources accurately and notes new funding sources in BIL.	The link to statewide funding programs in Chapter 4.4 is not up to date. Please consider adding a funding sources section in the appendix, which can be copied from the FFY 2024-2028 TIP document, or update the link to the below site that describes the funding categories. <a href="https://www.mass.gov/doc/stip-ffy-2023-2027-appendix-funding-category/download">https://www.mass.gov/doc/stip-ffy-2023-2027-appendix-funding-category/download</a>	Information updated, appendix added
Project Listing and Program Development		
Review Item	Comments	MPO Response
If projects are listed, they use MassDOT ProjectInfo TFPCs.	In the Table on Page 4 of Chapter 6, please update the TFPC for 609213 to match the TFPC in the Development TIP.	Information updated
Impact Analysis		
Review Item	Comments	MPO Response
Social equity analysis considers Title VI / language access.	Please consider including as an appendix item, can be copied directly from TIP/UPWP.	Appendix added
Social equity analysis considers EJ populations, including both federal and state definitions.	Please consider including as an appendix item, can be copied directly from TIP/UPWP.	Appendix added
Public involvement and comment are explicitly documented and in line with MPO's Public Participation Plan.	Please include an item in the appendix that documents or summarizes comments received during the draft RTP review period.	Comments included in Appendix

## 2. Montachusett Regional Transit Authority (MART) Comments and Responses

Comment	Response
MART provided a letter to the MRPC that outlined several points of information as well as additional clarification related to their operation. The full letter is treated as a direct comment regarding the RTP coverage of transit projects and operation. See following section for full letter.	Information provided was added and sections updated to Chapter 4.7 Transit as appropriate in order to reflect comments.

### 3. Groton Sustainability Commission and the North Central Climate Change Coalition Comments and Responses

The Groton Sustainability Commission and the North Central Climate Change Coalition presented several comments that were similar in nature. The table below lists the individual comments, which organization made the comment and then the response that addresses that comment.

No.	Comment	Source	Response
1	...performance measures for the GHG reduction goal are vague and short-lived; neither the metric of increasing alternative fuel vehicles in transit fleets or the metric of increasing electric vehicle (EV) charging infrastructure specify amounts of increase and both goals end in 2025. Could reasonable amounts of increase be specified, and could the timeline of increase extend beyond 2025? ...there is a missed opportunity to enhance EV charging planning by including use data associated with existing stations to understand optimal placement for maximal usage.	Groton Sustainability Commission	MRPC fully supports and conforms to MassDOT regulations and requirements as they relate to GHG reduction goals. Annual GHG analysis is conducted by MassDOT for the TIP as well as the RTP to determine Air Quality Conformity on a statewide basis. MRPC provides input and consultation to this analysis on a regular basis. In addition, project specific analysis is conducted during the TIP development process for identified projects. Regarding EV charging infrastructure, MRPC will work to support the state National Electric Vehicle Infrastructure (NEVI) Program Deployment Plan (referred to as the "NEVI Plan"). This is the framework for Massachusetts to expand its electric vehicle (EV) highway fast charging network through the National Electric Vehicle Infrastructure Program established by the Infrastructure Investment and Jobs Act (IIJA). Consistent with the intent of the NEVI Program, this plan focuses on direct current fast charging (DCFC) infrastructure serving long-distance travel corridors, specifically Massachusetts' federally designated EV Alternative Fuel Corridors. As these projects come online, the MRPC will work to ensure implementation in accordance with the state. <a href="https://www.mass.gov/service-details/deployment-plan-for-massachusetts">https://www.mass.gov/service-details/deployment-plan-for-massachusetts</a>
	Goal 7 - Reduce Greenhouse Gas (GHG) and Promote Environmental Practices and Sustainability. However, the lack of detail and planning related to the goal is very concerning. There are no robust strategies and performance measures to support the goal. The two metrics used for GHG emissions (increasing alternative fuels in transit fleets and EV charging infrastructure) end in 2025, just one year into the 2024 update. There needs to be additional goals set for 2030 at the very least.	North Central Climate Change Coalition	Transit goals are derived from MART's capital program that established goals for 2025 at the time of the plan's development. As these plans are updated, we will work to revise our measures as necessary. These metrics are also a measure limited to federally eligible facilities and infrastructure and are outside of any local development plans. Where applicable, the MRPC can work to encourage EV charging station implementation.
2	In addition, providing information on and grant writing support for incentives for EV chargers such as MasseVIP Public Access Charging Incentives and Educational Campus Charging Incentives would help achieve the goal of increasing the number of chargers throughout the region.	Groton Sustainability Commission	The MRPC has and always will offer services to our member communities with grant writing and support. Many communities have successfully made use of MRPC personnel to obtain grants of various types. Communities need to reach out to staff for input, assistance and support. Additionally, staff has written grant applications for programs that would cover multiple regional communities.
	In addition, providing information on and grant writing support for incentives for EV chargers such as MasseVIP Public Access Charging Incentives and Educational Campus Charging Incentives would help achieve the goal of increasing the number of chargers throughout the region.	North Central Climate Change Coalition	Staff regularly forwards to communities, announcements related to numerous federal and state grant opportunities. In addition, this information is also placed on the MRPC website under "Announcements". Recent examples are provided in a following table.






			These announcements and flyers are also a regular presentation at the monthly MJTC meetings. Meetings are open to the public. Please contact staff to be included in any future mailings. MJTC Meetings are held on the 2 <sup>nd</sup> Wednesday of the month at 2:30PM and MPO Meetings are held the 3 <sup>rd</sup> Wednesday at 1:00PM, both virtually with sign up access through <a href="http://mrpc.org">mrpc.org</a>
3	We urge the MRPC to devote more attention in its planning to assisting member towns with catching up with or exceeding state averages for alternative fuel vehicle adoption, thereby reducing overall transportation-related GHG emissions in the region.	Groton Sustainability Commission	The MRPC works to support federal and state programs, projects and goals as needed and appropriate. This includes notification of programs to assist communities with vehicle fleet conversion as well as supporting infrastructure. It is not within our purview to lobby for the private purchase of EV vehicles. MRPC will maintain a review of data through the MA Vehicle Census ( <a href="https://geodot-homepage-massdot.hub.arcgis.com/pages/massvehiclecensus">https://geodot-homepage-massdot.hub.arcgis.com/pages/massvehiclecensus</a> ) in order to help communities understand their profile data, but staff cannot lobby specifically for their purchase.
	The 2023 Massachusetts vehicle census data shows that 15 out of the 23 municipalities in the region have a proportion of zero-emission and hybrid registered vehicles at or below 3%, compared to the state average of 4.4% (MassDOT, 2023). We urge the MRPC to devote more attention in its planning to assisting member towns with catching up with or exceeding state averages for alternative fuel vehicle adoption, thereby reducing overall transportation-related GHG emissions in the region.	North Central Climate Change Coalition	
4	A recent estimate from the Department of Ecological Restoration cited more than half of culverts and small bridges in the state are undersized to handle the extreme rainfall events associated with climate change (MassDER, 2019). The MRTTP would benefit from similar analysis of road culvert size and condition across the region to help prioritize upgrades. Moreover, the MRTTP could facilitate needed upgrades in member towns by connecting them with available funding for these projects, such as the state Culvert Replacement Municipal Assistance Grant Program.	Groton Sustainability Commission	The MRPC has previously worked to develop an online app to assist communities with state mandated stormwater runoff regulations. The app is provided at no cost to town officials along with hands on training. To date, very few communities have made use of this application. Additionally, a survey of culvert data in the region would be a significant undertaking for staff. Funding restrictions would also prioritize federal aid eligible roadways. Staff can investigate the potential development of such a census for future Unified Planning Work Programs. Staff does regularly pass onto communities, information related specifically to culvert programs. These notices are emailed and posted to the MRPC website as well as mentioned at MJTC meetings. Please see the following table for specific past announcements related to culvert programs.
	In addition, a recent estimate from the Department of Ecological Restoration cited more than half of culverts and small bridges in the state are undersized to handle the extreme rainfall events associated with climate change. The MRTTP would benefit from similar analysis of road culvert size and road condition across the region to help prioritize upgrades. Moreover, the MRTTP could facilitate needed upgrades in member towns by connecting them with available funding for these projects, such as the state Culvert Replacement Municipal Assistance Grant Program.	North Central Climate Change Coalition	
5	Transportation Plan for the region must address ... by beginning to explore mobility and transit solutions for all our communities. The plan needs mobility strategies and performance measures related to providing alternatives to personal vehicles. ,, The Rural	North Central Climate Change Coalition	The Ridership Demographics Study is planned to be conducted by MART and will utilize new fare collection systems that will provide increased data on ridership, boarding locations and payment type. Data will be collected over the upcoming fiscal years. It should be noted that ridership levels are

	Policy Plan for the Commonwealth of MA has some transportation recommendations that might be useful for the many rural communities in the MRPC service area and could be incorporated into the plan. ... the Journey to 2050 needs to have more information about the Rider Demographics Study. How will that be completed in an equitable way that addresses both rural and urban needs? What will it cost? When will it be completed?		still lower than pre-pandemic figures. Information collected may therefore be limited due to smaller sample sizes. As the program continues, a stronger database will result and provide better number for analysis.
6	...strongly recommend that the MRTP Journey to 2050 includes an examination of opportunities to address transit and mobility solutions that cross Regional Planning Agency boundaries. ... Adjoining communities are often in different RPAs. This complicates our ability to address regional solutions. ... We noticed that comments at one of the public input sessions addressed a request for intercity transit between Fitchburg and Lowell as well as Fitchburg and Worcester. RPAs and Transit Authorities need to work together and begin to plan for these much needed services which could help reduce GHG emissions.	North Central Climate Change Coalition	The MRPC regularly works with MART on transit services, needs and projects. Several Transit Development Plans have been developed in the past that helped MART address changing demographics and needs. This will continue to be the case. MART, under new leadership, is undertaking a review of its services with the overall goal to implement and expand services to areas of need. In addition, the MRPC is planning to conduct a Transportation Management Area (TMA) study in the next FFY to help address issues such as micro transit and improved services. From this study, it is hoped that some of these issues in rural communities can be addressed in a positive manner. Additionally, MRPC transportation and transit staff meet on a regular basis with other RPAs to discuss numerous issues and to liaison on work projects. This is an open line of communication that provides us with insight and knowledge of what is occurring outside of our planning areas.



## Sample of Announcement Postings Regarding Available Grant Programs

Culvert Program Announcements – 2019 to 2023	
<p><u><b>January 24, 2019 - Announcement</b></u>  <b>Notice of Grant Opportunity - Culvert Replacement Municipal Assistance Grant Program</b>  <small>POSTED ON: JANUARY 24, 2019 - 1:20PM</small></p> <p><b>UNPUBLISHED</b></p> <p>Notice of Grant Opportunity  Culvert Replacement Municipal Assistance Grant Program</p>  <p>The Division of Ecological Restoration (DER), Massachusetts Department of Fish and Game, is seeking proposals from Massachusetts municipalities interested in replacing an undersized, perched, and/or degraded culvert located in an area of high ecological value. The purpose of this funding is to encourage municipalities to replace culverts with better designed crossings that meet improved structural and environmental design standards and climate resiliency criteria. <b>Total funding available for all projects selected in FY22 is anticipated to be \$750,000-\$1,500,000.</b></p>	<p><u><b>February 27, 2020 - Announcement</b></u>  <b>Culvert Replacement Municipal Assistance Grants - Now Accepting Applications!</b>  <small>POSTED ON: FEBRUARY 27, 2020 - 11:26AM</small></p> <p><b>UNPUBLISHED</b></p> <p>Notice of Grant Opportunity  Culvert Replacement Municipal Assistance Grant Program</p> <p><b>Culvert Replacement Grant – GRANT DEADLINE EXTENDED to April 15!</b></p> <p>On March 10, the Baker-Polito Administration declared a State of Emergency for the Coronavirus (COVID-19). DER realizes municipalities across the Commonwealth are taking steps to prevent and mitigate the spread of the disease, including needing to dedicate municipal staff and operations to coordinate local response. To provide municipalities additional time for preparation and submittal of grant applications, <b>DER has extended the grant application deadline until 5:00 PM, April 15, 2020.</b></p> 
<p><u><b>January 21, 2021 - Announcement</b></u>  <b>Notice of Grant Opportunity - Culvert Replacement Municipal Assistance Grant Program</b>  <small>POSTED ON: JANUARY 21, 2021 - 10:24AM</small></p> <p><b>UNPUBLISHED</b></p> <p>Notice of Grant Opportunity  Culvert Replacement Municipal Assistance Grant Program</p>  <p>The Division of Ecological Restoration (DER), Massachusetts Department of Fish and Game, is seeking proposals from Massachusetts municipalities interested in replacing an undersized, perched, and/or degraded culvert located in an area of high ecological value. The purpose of this funding is to encourage municipalities to replace culverts with better designed crossings that meet improved structural and environmental design standards and climate resiliency criteria. <b>Total funding available for all projects selected in FY22 is anticipated to be \$750,000-\$1,500,000.</b></p>	<p><u><b>February 14, 2022 - Announcement</b></u>  <b>Culvert Replacement Municipal Assistance Grant Accepting Applications</b>  <small>POSTED ON: FEBRUARY 14, 2022 - 3:24PM</small></p> <p><b>UNPUBLISHED</b></p> <p>Culvert Replacement Municipal Assistance Grant - Now Accepting Applications!  Notice of Grant Opportunity</p>  <p>The Division of Ecological Restoration (DER), Massachusetts Department of Fish and Game, seeks proposals from Massachusetts municipalities interested in replacing undersized, perched, and/or degraded culverts located in areas of high ecological value. The purpose of this funding is to encourage municipalities to replace culverts with better designed crossings that meet improved structural and environmental design standards and climate resiliency criteria. In general, <b>individual awards have ranged from \$25,000 to \$400,000 for single culvert replacements</b>, depending on the project phases and work proposed. Awards over \$200,000 are anticipated for construction projects only.</p>
<p><u><b>October 12, 2022 – Announcement</b></u>  <b>National Culvert Removal, Replacement, and Restoration Grants (Culvert AOP) Program</b>  <small>POSTED ON: OCTOBER 12, 2022 - 9:11AM</small></p> <p><b>UNPUBLISHED</b></p> <p>Notice of Funding Opportunity (NOFO) for the National Culvert Removal, Replacement, and Restoration Grants (Culvert AOP) Program.</p>  <p>Eligible activities for the program include projects to replace, remove, or repair culverts that would meaningfully improve or restore fish passage for anadromous fish; [§ 21203(a); 49 U.S.C. 6703(b)] and projects to replace, remove, or repair weirs that would meaningfully improve or restore fish passage for anadromous fish. Anadromous fish species are born in freshwater such as streams and rivers, spend most of their lives in the marine environment, and migrate back to freshwater to spawn, like salmon, sturgeon, river herring, striped bass, and other species.</p> <p>Eligible applicants include states, local governments, and recognized Indian tribes; applications are due 2/26/23.</p>	<p><u><b>March 6, 2023 - Announcement</b></u>  <b>Notice of Grant Opportunity: Culvert Replacement Municipal Assistance Grant - Now Accepting Applications!</b>  <small>POSTED ON: MARCH 6, 2023 - 11:08AM</small></p> <p><b>UNPUBLISHED</b></p>  <p>Culvert Replacement Municipal Assistance Grant:  <b>Application Deadline Extended to: Tuesday, April 4, 5pm</b>  <b>COMMBUYS</b> has been experiencing intermittent outages today. As a result, the deadline for CRMA grant applications has been extended to <b>Tuesday, April 4 at 5pm</b>. We have also included a copy of all application materials on our website here:  <a href="https://www.mass.gov/how-to/culvert-replacement-municipal-assistance-grant-program">https://www.mass.gov/how-to/culvert-replacement-municipal-assistance-grant-program</a></p>

Electric/Alternative Vehicle Replacement Program Announcements – 2021 to 2023	
<p><u><b>January 11, 2021 - Announcement</b></u></p> <p><b>Massachusetts Electric Vehicle Incentive Program</b></p> <p>MassDEP Announces New Program and Enhancements to Existing Programs</p> <p>POSTED ON: JANUARY 11, 2021 - 11:26AM</p> <p><b>UNPUBLISHED</b></p> <p>The Massachusetts Department of Environmental Protection (MassDEP) is pleased to announce a new electric vehicle charging infrastructure program and enhancements to three existing programs under the Massachusetts Electric Vehicle Incentive Program (MassEVIP) banner!</p> <p>MassDEP has added a new DC Fast Charging Station Program.</p> <p>The Direct Current Fast Charging Program (DCFC) is a competitive grant with an <b>application deadline of March 19, 2021</b>. This program is open to property owners or managers of non-residential locations that are accessible for use by the general public 24 hours per day, or to educational campuses with at least 15 students on site and available to all students and staff. The program provides hardware and installation costs (up to \$50,000 per charging station) as follows:</p> 	<p><u><b>June 30, 2022 - Announcement</b></u></p> <p><b>MassDEP Announces Diesel Emission Reduction Act Electric Solicitation Grant</b></p> <p>POSTED ON: JUNE 30, 2022 - 3:11PM</p> <p><b>UNPUBLISHED</b></p> <p>The Massachusetts Department of Environmental Protection (MassDEP) is pleased to announce a new funding opportunity for private, public, and non-profit entities to replace eligible diesel vehicles and equipment with zero emission technologies. Through the federal Diesel Emissions Reduction Act (DERA) program, Massachusetts is conducting a competitive electric-only Solicitation with an application deadline of 5 PM <b>August 24, 2022</b>. This is an early replacement program designed to accelerate the retirement of less efficient and more polluting diesel vehicles and equipment. See the website for more information and to apply: <a href="https://www.mass.gov/how-to/apply-for-a-diesel-emissions-reduction-act-dera-electric-solicitation-grant">https://www.mass.gov/how-to/apply-for-a-diesel-emissions-reduction-act-dera-electric-solicitation-grant</a>.</p> 
<p><u><b>July 27, 2023 - Announcement</b></u></p> <p><b>VW and Refuse Truck Electric Solicitation Grant Announced By MassDEP</b></p> <p>POSTED ON: JULY 27, 2023 - 3:50PM</p> <p>The Massachusetts Department of Environmental Protection (MassDEP) is pleased to announce a new funding opportunity for private and public entities to replace eligible diesel vehicles and equipment. Through the VW settlement, MassDEP is allocating \$7.5 million for zero-emission technologies. As part of the initiative in the 2030 Solid Waste Master Plan, funded by the Climate Protection and Mitigation Expendable Trust (CMT), MassDEP is allocating \$4 million to replace municipal waste-serving refuse trucks with more efficient options. This competitive Solicitation has an application deadline of 5 PM <b>September 26, 2023</b>. See more details in our <a href="#">guidance document</a>.</p> <p>Eligible projects</p> <p>1. VW Projects</p> <p>To be eligible for VW funds, existing equipment must meet the engine model year, usage, emission tier, and other requirements of each eligible mitigation action (EMA) listed below:</p> 	
Mobility Program Announcements – 2021 to 2023	
<p><u><b>November 30, 2021 - Announcement</b></u></p> <p><b>Webinar on Funding for Open Space, Trails, and Active Transportation</b></p> <p>POSTED ON: NOVEMBER 30, 2021 - 11:48AM</p> <p><b>UNPUBLISHED</b></p> <p>Looking to create more green space and parks, recreational trails and bike lanes, and sidewalks in your community? Learn about state and private funding sources to help make this happen. Join us for a webinar to discuss funding opportunities across the Commonwealth.</p> <p><b>Speakers</b></p> <p><u>Allison Burson</u> - Program Manager at the Lawrence &amp; Lillian Solomon Foundation</p> <p><u>Melissa Cryan</u> - Grant Programs Supervisor, Division of Conservation Services at MA Executive Office of Energy and Environmental Affairs</p> <p><u>Matt Genova</u> - Transportation Improvement Program Manager - Central Transportation Planning Staff at Boston Region Metropolitan Planning Organization</p> 	<p><u><b>January 5, 2022 - Announcement</b></u></p> <p><b>Mobility Management in Massachusetts Webinar February 3rd, 10 am to noon</b></p> <p>POSTED ON: JANUARY 5, 2022 - 11:15AM</p> <p><b>UNPUBLISHED</b></p> <p>Save the date for a virtual forum!</p> <p><b>Mobility Management in Massachusetts</b> February 3, 10am-noon</p> <p><a href="#">Register here</a></p> <p>Navigating community transportation options can be confusing for older adults, people with disabilities, and others in need of a ride. Through using <b>mobility management</b> strategies, you can facilitate mobility - by working directly with consumers to help them become aware of and learn to use the options available to them, and/or by working with transportation providers and other stakeholders to coordinate and expand mobility options.</p> 
<p><u><b>May 24, 2023 - Announcement</b></u></p> <p><b>Virtual Workshop: Quabbin Area Transportation Needs</b></p> <p>POSTED ON: MAY 24, 2023 - 6:44AM</p> <p><b>UNPUBLISHED</b></p> <p>VIRTUAL TRANSPORTATION WORKSHOP FOR MUNICIPAL AND COMMUNITY ORGANIZATION STAKEHOLDERS</p> <p>JUNE 14, 1PM</p> <p>Central Mass Regional Planning Commission, in partnership with the Health Equity Partnership of N. Central MA and the Montachusett Regional Planning Commission, is conducting a study of transportation options and needs for the Quabbin region.</p> 	<p><u><b>May 9, 2023 - Announcement</b></u></p>



## MassDOT's FY24 Community Transit Grant Program is Now Accepting Applications

POSTED ON: MAY 9, 2023 - 3:30PM

**UNPUBLISHED**

MassDOT's FY24 Community Transit Grant Program is now accepting applications for operating and mobility management projects that expand mobility for older adults and people with disabilities!

If you are interested in applying, reach out to request application forms and application training. You can reach MassDOT at [Rachel.L.Fichtenbaum@dot.state.ma.us](mailto:Rachel.L.Fichtenbaum@dot.state.ma.us) or (857) 368-8584. We look forward to working with you!

**Applications are due June 23, 2023.** Start early to ensure you have plenty of time. Applications for wheelchair-accessible vehicles will open later this year.



Climate Change & Other Federal Program Announcements – 2018 to 2023	
<p><u><b>May 3, 2018 - Announcement</b></u></p> <h3>Chemical Safety &amp; Climate Change Preparedness Resources</h3> <p>POSTED ON: MAY 3, 2018 - 10:33AM</p> <p><b>UNPUBLISHED</b></p> <p>Over the last six months, two Training Workshops were held regarding Chemical Safety and Climate Change Preparedness Training in partnership with the Massachusetts Office of Technical Assistance and Technology. These training workshops were well-attended by municipal emergency personnel and local businesses and were highly informative.</p> <p>Click this link for presentations and handouts.</p> <p><a href="http://www.mrpc.org/comprehensive-planning/pages/ma-chemical-safety-and-climate-change-preparedness-training">http://www.mrpc.org/comprehensive-planning/pages/ma-chemical-safety-and-climate-change-preparedness-training</a></p>	<p><u><b>May 12, 2022 - Announcement</b></u></p> <h3>Federal and State Funding Opportunities</h3> <p>For More Information See the Program and Webinar Announcements</p> <p>POSTED ON: MAY 12, 2022 - 1:25PM</p> <p><b>UNPUBLISHED</b></p> <p>USDOT and MassDOT Funding Programs Announced.</p> <p>The U.S. Department of Transportation (DOT) and the Massachusetts Department of Transportation (MassDOT) announce upcoming webinars and Programs related to funding opportunities through the federal Bipartisan Infrastructure Law (BIL) and a state public/private partnership program.</p> <ul style="list-style-type: none"> <li>The U.S. Department of Transportation will host a webinar for potential applicants to get ready for the forthcoming <b>Reconnecting Communities Pilot</b> (RCP) discretionary grant program on <b>Thursday, May 19 from 1:30pm – 2:30pm EDT</b>. The RCP was created under the Bipartisan Infrastructure Law and will provide up to \$1 billion over the next 5 years. The program's funds can</li> </ul> 
<p><u><b>July 19, 2022 - Announcement</b></u></p> <h3>Federal Funding Grants and Programs from the BIL</h3> <p>POSTED ON: JULY 19, 2022 - 2:37PM</p> <p><b>UNPUBLISHED</b></p> <p>The Bipartisan Infrastructure Law (BIL) has initiated a number of new funding opportunities for local communities, transit authorities, regional planning agencies and Metropolitan Planning Organizations (MPOs). Each program has different applications, project eligibility requirements and deadlines. The Notice of Funding Opportunity (NOFO) for these various programs contain the necessary information to complete and submit an application for funding.</p> <p>The programs covered in this announcement include:</p> <ul style="list-style-type: none"> <li><b>Safe Streets for All (SS4A)</b> - The purpose of SS4A grant program is to improve roadway safety by</li> </ul> 	<p><u><b>April 4, 2023 - Announcement</b></u></p> <h3>FHWA Planning and Grant Program Updates</h3> <p>POSTED ON: APRIL 4, 2023 - 10:46AM</p> <p>The Federal Highway Administration (FHWA) announces the following programs and grant opportunities that may be of interest to local communities, organizations, etc.</p> <p><b>USDOT Announces Wildlife Crossings Pilot Program</b></p> <p>The Notice of Funding Opportunity (NOFO) for the <b>Wildlife Crossings Pilot Program</b> opened for Fiscal Years 2022 and 2023 in the amount of \$111.85 million. The program helps carry out projects by certain Federal, Tribal, State, and local governments, including municipalities, counties, and others that reduce wildlife-vehicle collisions and improve habitat connectivity for terrestrial and aquatic species. The funding may be used for construction and non-construction projects and the maximum share of project costs that may be funded with grant funds will typically be 80 percent of project</p> 

#### 4. Carolyn Sellars Letter Comments and Responses

Comment from Carolyn Sellars, Private Citizen	
Comments	MPO Response
<p>A comment was received from Carolyn Sellars, private citizen. The comment was extensive and covered a range of topics from climate change, outreach, equity, trends etc. It made reference to a variety of other plans and their findings, along with the findings of other planning exercises in the region. Aside from general comments on the RTP itself, specific references to proposed changes were made in the following sections: Executive Summary; Chapter 2-Vision Statement, Strategies and Objectives; Chapter 3-Performance Measures; Chapter-4.1 Demographics; Chapter 4.5-Economic Vitality; Chapter 4.6-Congestion; Chapter 4.7-Transit; Chapter-4.8 Environment; Chapter 5-Public Outreach; Chapter 6-Transportation Equity; Chapter 7-Regional Trends; Chapter 8-Planning Scenarios. This comment is included in its entirety in the appendix of this RTP.</p>	<p>MPO staff appreciates your detailed review and feedback and has taken your comments into consideration. Your full comment will be included in an appendix to the final document. Please note that the creation of this RTP occurred alongside a robust public engagement process, which had begun in the Spring of 2022 and was designed to get feedback from both public officials and the general public. For example, the development of our Goals, Objectives, Strategies and Performance Measures culminated from extensive presentation, discussion, and feedback from our MJTC and MPO over the course of 10 months. This information has also been posted on our RTP website, available to the public from April of 2023. Although we will not incorporate every suggestion at this time, this plan will serve as a living document and be updated every five years. Below are some items mentioned in your comment which we have considered feasible to include at this time.</p> <p>Add reference to the following plans and their analysis:</p> <ul style="list-style-type: none"> <li>o 2022 MA Climate Assessment</li> <li>o Clean Energy and Climate Plan</li> <li>o Rural Policy Plan</li> <li>o DER reporting on culverts</li> <li>o National Electric Vehicle Infrastructure (NEVI) Program Deployment Plan</li> <li>o MA Vehicle Census</li> <li>o Global Warming Solutions Act</li> </ul> <p>* Add additional narrative to the history of the region to include Indigenous American settlements and the role they played in the creation of the modern transportation network.</p> <p>We would also like to mention our role in supporting the many funding opportunities originating out of the above plans and others. We frequently promote these opportunities to our member communities through our public meetings, emails, hosting presentations and our website. Goal 7 in this RTP is to <i>Reduce Greenhouse Gas (GHG) and Promote Environmental Practices and Sustainability</i>. We may not have the capacity or jurisdiction to plan and fund projects supporting this goal, but we are an active partner in promoting avenues to help accomplish this goal. We truly value your input and appreciate the need to improve climate and mobility issues which exist in the network. We look forward to working together to make improvements to the regional transportation system in the future.</p>

## Montachusett Regional Transit Authority – Comment Letter

The Montachusett Regional Transit Authority (MART) operates the fixed route transit system in the region. As has been the case since the authority was started in 1978, fixed route services are mainly concentrated within the urban cities of Fitchburg, Leominster, Gardner and to a lesser degree – Westminster, Lunenburg and Lancaster. Over the past ten years, service has expanded slowly into neighboring rural communities. The expansion has been driven both by requests by local communities, as well as the need for services to integrate with redesigned fixed routes and schedules.

MART has also worked with communities to develop micro transit services to support expanded business opportunities and a growing number of regional attractions in its service area. Over the past three years, MART has endeavored to accomplish many of the goals that were set established in the 2020 RTP, albeit within the numerous and unprecedented challenges presented by the pandemic, some of which are still presenting limitations on the ability to provide expanded services, primarily workforce expansion and funding limitations. Below are some bullets points on the many changes and growth experienced over the last four years.

### Current Transit Capital Improvements

1. MART has purchased and deployed a fleet of mini buses (Arbocs) which were purchased and deployed to significantly reduce:
  - Fleet acquisition costs
  - Operational costs
  - Maintenance costs

The mini buses will be used to:

- Operate fixed routes with ridership that does not warrant a large frame bus
  - Establish feeder routes between unserved and under-served areas of the fixed route communities and the current fixed routes; and
  - Develop shuttle routes between rural communities and the fixed route communities for access to fixed route services.
2. MART has purchased and is utilizing recently acquired GPS-based transit technologies:
    - Genfare Fare Collection System
      - Provides Multiple Purchase Options
        - Mobile devices
        - Internet
        - On-vehicle
        - Ticket Vending Machines
      - Provides Internal Data Collection and Trend Analysis
        - Ridership
        - Boarding location
        - Payment methodology
    - Passio Go! System
      - Provides passengers w/ estimated arrival time at stops.
      - Provides transit staff w/ operational vehicle tracking.
      - Automated Passenger Counters
      - Provides transit staff w/ On-Time Performance capabilities for analyzing and improving fixed route and paratransit system performance.

### Current Transit Operational Improvements

The Athol Shuttle route and schedule was modified in December 2022, increasing the service area and improving the route timing. Ridership has increased by 6% through June 2023.

The Advisory Board of the Transit Authority recently voted to approve several key fare policy changes:

- Full fares were reduced from \$1.25 to \$1.00.
- School age students ride free.
- No cost transfers for inter-city regional routes.

MART has also recently launched two new micro transit services:

- Sterling, Lancaster, and Lunenburg service (funded by MassDevelopment Taxi/Livery grant)
- Bolton, Boxboro, Littleton and Stow service (funded by MAPC Community Connections grant)

### **Future Transit Improvements**

The following transit improvements are currently in process or will be getting underway during FY24:

- The Gardner fixed routes are being assessed for:
  - Service area improvements
  - Improvements to the route schedules for commuter and local businesses
- Assessing and analyzing Fitchburg / Leominster fixed routes to enhance routing and schedules.
- Purchasing a facility within Devens to establish a satellite operations center to improve the ability to develop fixed route services to Devens, as well as to provide services in the eastern portion of our service area.
- Launching transit dashboards for improved access to information

### **Transit Challenges**

1. MART and its operating companies are still experiencing significant financial and operational impacts resulting from increased costs related to supply chain shortages, as well as a challenging workforce and labor participation environment.
2. Capital projects continue to be negatively impacted, due to significantly higher costs, contractor responsiveness and supply chain product availability.
3. All MART commuter rail garage facilities continue to generate substantially less parking fare revenue than the pre-pandemic period.
4. Although ridership continues to recover, both fixed route and paratransit ridership are still below pre-pandemic levels.

### **Human Service Transportation Brokerage Improvements**

MART responded to a Request for Proposals issued by the Executive Office of Health and Human Services for Human Service Transportation (HST) Brokerage Services in June of 2020 and was subsequently awarded two of the three newly defined regions for brokerage services to commence on July 1, 2021. MART now manages more than eighty-two percent (82%) of the HST brokerage for the Commonwealth of Massachusetts.

To enhance the management of the brokerage services, MART developed and deployed additional technologies and reporting systems including:

- **Technologies**
  - MassHealth Member Trip Booking Portal
  - Facility Trip Booking Portal
  - Call Center w/ Integrated Voice Response (IVR)
  - Real-time notifications to customers for vehicle arrivals
  - Web portals for Complaint and Service reporting
  - GPS vehicle tracking
  - Vendor Contract Management and Credentialing Portal
  - Integration w/ Lyft

- **Reporting Dashboards**

- Trip volume reporting (by agency, trip type, region, etc.)
  - Distribution by Company, driver, vehicle type, etc.
  - On-time performance
- Expenditure reporting (by agency, trip type, region, city/town/etc.)
  - Total cost of trips
  - Average cost per trip
- Call Center Metrics
  - Call Volume
  - Answered vs. Abandoned Calls
  - Call Duration
  - Available agents (by hour, region, agency, etc.)
- Complaints
  - Complainant Information
  - Transportation Provider Information
  - Complaints by category
  - Time to resolve and notification to consumer.
  - By Agency, region, date, etc.

The significant enhancement to the technologies used to manage the brokerage operations, as well as the enhanced and upgraded dashboard reporting has substantially improved the customer experience and the abilities of MART and the HST office to manage the expanding needs and growth of the HST brokerage.

For FY23, MART provided nearly 5.8 million trips with a budget of \$235 million. The trips continue to increase post-COVID and MART is continuing to increase the pool of transportation providers providing services. The new integration with Lyft will greatly improve the increasingly frequent need to provide same day / next day trips, as well as non-emergent hospital trips and releases.



## Sustainability Commission

Letter to the Montachusett Regional Planning Commission regarding comments on the Draft 2024 Montachusett Regional Transportation Plan

To: Montachusett Regional Planning Commission

Cc: Groton MRPC Representatives Peter Cunningham and Russell Burke, the Groton Select Board

Dear Commission Members,

After reviewing the Draft 2024 Montachusett Regional Transportation Plan (MRTP), the Groton Sustainability Commission has several comments to address insufficient attention and planning with regards to climate change mitigation and adaptation related to transportation.

First, while the Sustainability Commission applauds the inclusion of a goal of reduction of greenhouse gas (GHG) emissions related to transportation in the region, the goal is poorly supported throughout the remainder of the plan. For example, performance measures for the GHG reduction goal are vague and short-lived; neither the metric of increasing alternative fuel vehicles in transit fleets or the metric of increasing electric vehicle (EV) charging infrastructure specify amounts of increase and both goals end in 2025. Could reasonable amounts of increase be specified, and could the timeline of increase extend beyond 2025?

Furthermore, in subsequent sections the MRTP acknowledges the need for additional planning to understand where EV charging stations should be located. The plan also tracks existing charging stations across the region. However, there is a missed opportunity to enhance EV charging planning by including use data associated with existing stations to understand optimal placement for maximal usage. In addition, providing information on and grant writing support for incentives for EV chargers such as MassEVIP Public Access Charging Incentives and Educational Campus Charging Incentives would help achieve the goal of increasing the number of chargers throughout the region.

2023 Massachusetts vehicle census data shows that 15 out of the 23 municipalities in the region have a proportion of zero-emission and hybrid registered vehicles at or below 3%, compared to the state average of 4.4% (MassDOT, 2023). Furthermore, most of those towns have average daily mileage per registered vehicle of less than 30 miles, which is the current average range for plug-in electric hybrid vehicles and far below the current median range for all-electric vehicles (MassDOT, 2023). We urge the MRPC to devote more attention in its planning to assisting member towns with catching up with or exceeding state averages for alternative fuel vehicle adoption, thereby reducing overall transportation-related GHG emissions in the region.

Sustainability Commission, Groton Town Hall, 173 Main St., Groton, MA 01450  
sustaining@townofgroton.org • (978) 448-1111



Finally, the impacts of climate change are imminent: the recent flooding in Vermont, New York and western Massachusetts illustrates the unprecedented nature of these impacts and underscores the urgent need for regional climate change adaptation planning and implementation, especially related to extreme rainfall events. While the MRTTP lays out a thorough analysis of threatened dams and bridges, it insufficiently addresses the issue of undersized culverts. A recent estimate from the Department of Ecological Restoration cited more than half of culverts and small bridges in the state are undersized to handle the extreme rainfall events associated with climate change (MassDER, 2019). The MRTTP would benefit from similar analysis of road culvert size and condition across the region to help prioritize upgrades. Moreover, the MRTTP could facilitate needed upgrades in member towns by connecting them with available funding for these projects, such as the state Culvert Replacement Municipal Assistance Grant Program.

Thank you for considering these comments on the MRTTP.

Respectfully submitted,

The Groton Sustainability Commission

References:

1. Massachusetts Department of Transportation. (2023). Massachusetts vehicle census. [MassVehicleCensus | GeoDOT \(arcgis.com\)](#)
2. Massachusetts Division of Ecological Restoration (2019). DER's 10<sup>th</sup> Anniversary: Helping municipalities replace outdated and undersized culverts. [DER's 10th Anniversary: Helping Municipalities Replace Outdated and Undersized Culverts | Mass.gov](#)

## North Central Climate Change Coalition

July 24, 2023

To: Montachusett Regional Planning Commission Members

Re: Comments on Draft 2024 Montachusett Regional Transportation Plan, Journey to 2050

Dear Commission Members,

Thank you for the opportunity to review the Draft 2024 Montachusett Regional Transportation Plan, Journey to 2050 (MRTP). The [North Central Climate Change Coalition \(NC4\)](#) has several concerns we would like addressed before the plan is finalized.

[NC4](#) is composed of municipal and civic leaders working on the frontlines of climate change resistance, resilience and adaptation. Our geographic coverage area includes communities in or adjoining the MA 3rd Congressional District. This includes most of the MRPC planning area and MART service areas.

The Transportation sector accounted for 42% of MA Greenhouse Gas (GHG) emissions in 2019, according to the [MA Clean Energy and Climate Plan](#). It's critical that our regional transportation plan addresses ways we reduce these emissions locally.

We greatly appreciate the inclusion of Goal 7 - **Reduce Greenhouse Gas (GHG) and Promote Environmental Practices and Sustainability**. However, the lack of detail and planning related to the goal is very concerning. There are no robust strategies and performance measures to support the goal. The two metrics used for GHG emissions (increasing alternative fuels in transit fleets and EV charging infrastructure) end in 2025, just one year into the 2024 update. There needs to be additional goals set for 2030 at the very least.

The first transportation strategy in the [MA Clean Energy and Climate Plan](#) is to "Promote Alternatives to Personal Vehicle Travel." Our 2050 Transportation Plan for the region must address this by beginning to explore mobility and transit solutions for all our communities. The plan needs mobility strategies and performance measures related to providing alternatives to personal vehicles. We understand this will be a challenge. North Central MA has had underfunded public mobility needs for many decades. Yet, we also know that we need to start planning now to explore what might help us enjoy healthier and safer communities in the future. The [Rural Policy Plan for the Commonwealth of MA](#) has some transportation recommendations that might be useful for the many rural communities in the MRPC service area and could be incorporated into the plan. At the very least, the Journey to 2050 needs to have more information about the Rider Demographics Study. How will that be completed in an equitable way that addresses both rural and urban needs? What will it cost? When will it be completed?

1 of 2

The [2023 Massachusetts vehicle census data](#) shows that 15 out of the 23 municipalities in the region have a proportion of zero-emission and hybrid registered vehicles at or below 3%, compared to the state average of 4.4% (MassDOT, 2023). We urge the MRPC to devote more attention in its planning to assisting member towns with catching up with or exceeding state averages for alternative fuel vehicle adoption, thereby reducing overall transportation-related GHG emissions in the region. In addition, providing information on and grant writing support for incentives for EV chargers such as MassEVIP Public Access Charging Incentives and Educational Campus Charging Incentives would help achieve the goal of increasing the number of chargers throughout the region.

NC4 also advocates for measures to address changes already happening in our communities due to greenhouse gas pollution. We appreciate the discussion on threatened dams and bridges in the 100 year flood areas. Please note that the FEMA mapped 100 year flood areas do not reflect the more frequent, short intense storms we now experience. The Washington Post reported that ["FEMA officials have testified to Congress that over 40 percent of the NFIP claims made in 2017-2019 were for properties outside official flood hazard zones, or in areas the agency had yet to map."](#) The MRTP should minimally acknowledge this fact to initiate plans across member towns to understand the full threat of climate change-related impacts. In addition, a recent estimate from the [Department of Ecological Restoration](#) cited more than half of culverts and small bridges in the state are undersized to handle the extreme rainfall events associated with climate change. The MRTP would benefit from similar analysis of road culvert size and road condition across the region to help prioritize upgrades. Moreover, the MRTP could facilitate needed upgrades in member towns by connecting them with available funding for these projects, such as the state Culvert Replacement Municipal Assistance Grant Program.

Finally, we strongly recommend that the MRTP Journey to 2050 includes an examination of opportunities to address transit and mobility solutions that cross Regional Planning Agency boundaries. Our NC4 target communities, the MA 3rd Congressional District, are represented by five different Regional Planning Agencies (RPAs). Adjoining communities are often in different RPAs. This complicates our ability to address regional solutions. For example, the adjoining communities of Littleton, Groton and Pepperell are in three different RPAs. We noticed that comments at one of the public input sessions addressed a request for intercity transit between Fitchburg and Lowell as well as Fitchburg and Worcester. RPAs and Transit Authorities need to work together and begin to plan for these much needed services which could help reduce GHG emissions.

Thank you very much for the opportunity to comment. Please let me know if you have questions or need clarification on anything. Our NC4 meetings have included representatives of NMCOG in the past and we would warmly welcome MRPC at one of our future NC4 meetings. We meet virtually at 7 pm on the third Wednesday of each month.

Respectfully submitted,  
Tony Beattie, NC4 Chair, Pepperell Selectboard and representative on NC4

cc: Selectboards/Mayors of Ashburnham, Ashby, Ayer, Clinton, Fitchburg, Gardner, Groton, Harvard, Hubbardston, Lancaster, Leominster, Littleton, Lunenburg, Royalston, Shirley, Sterling, Templeton, Townsend, Westminster, Winchendon

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## C. Sellars – Comment Letter

July 24, 2023

Re: Comments on the Journey to 2050, Regional Transportation Plan for the Montachusett Region

Dear Members of Montachusett Regional Planning Commission and staff,

Thank you for the opportunity to provide comment on the 2024 update to the “*Journey to 2050*” Regional Transportation Plan (RTP) for the Montachusett Region. I greatly appreciate the time and expertise put into the document.

The RTP must adequately reflect and quantify (as much as possible) all mobility needs for our region. We need to actively envision and plan what we want our region to be in the future and then plan a mobility program that will help realize that future. As described in the announcement of the comment period, “The RTP also serves to provide a basis for any federally financed transportation and transit project, program, or study.” We must be ready to access and use any funds available to serve all our region’s mobility needs including those that may be related to reducing Greenhouse Gas (GHG) emissions.

Earlier this year the Health Equity Partnership of North Central MA (CHNA9) undertook a series of [Community Charettes](#) to provide input for our region’s Community Health Improvement Plan (CHIP). By partnering with trusted local organizations and providing, food, childcare and a variety of times, more than 160 people came to one of the five 3-hour meetings. About one quarter of the participants used the translation services (Spanish, Portuguese, and Haitian Creole) provided. After spending time envisioning what a healthy North Central MA would look like in ten years, participants participated in a Key Domino Analysis. This involved looking at various identified goals to determine which ones were most likely to drive change.



The key dominos identified during the Charettes are:

- Less Racism
- Stronger Connections and Collaboration
- More Effective Policies and Funding
- More Affordable, Reliable and Convenient Transportation

Transportation was a key domino which had a positive influence on many goals and was identified as critical to the success of other goals. Stronger Connections and Collaboration is one of the key drivers supported by better transportation. Stronger Connections and Collaboration support Less Racism and More Effective Policies and Funding which in turn support better transportation. These four goals are inextricably intertwined. This underscores the need for a comprehensive transportation plan which addresses all our region’s needs.

I have been supporting the Health Equity Partnership of North Central MA in their efforts in [integrate Climate Justice into their work](#). I attended and helped facilitate all but one of the charettes. I know the region and the needs well. We chose to raise our family here and have decided to stay here in our retirement. I have spent much of the past 40 years helping to make North Central MA a great place to live as a volunteer, municipal official, and at several non-profits.

I have several significant concerns about the report which I would like to see addressed before it is endorsed as a final document. Major concerns include:

- Coverage of climate justice issues including the need for more robust transit plans to help with greenhouse gas emission reductions.
- Lack of details on mobility and transit planning
- Population projection assumptions and how these assumptions relate to the plan.

My specific comments on the document have more detail about all three concerns. I want to highlight a few important ones here at the beginning.

### Coverage of other plans including recent climate and rural issues planning

Throughout the report, there were multiple references to the Covid Pandemic’s impact in the region. This is appropriate since it occurred after the initial 2020 Plan was completed. It would have been nice to also see some discussion of what we learned from the Covid experience such as identifications of critical workers, where they live and needed to be, and any unmet transit needs they had.

The report did not provide information or detail on other important developments since the original 2050 plan was produced in July 2019. Over the past few years, the Commonwealth has produced several reports relating to climate issues that should be addressed in our regional transportation plan. This includes the [2022 MA Climate Assessment](#) and the [Clean Energy and Climate Plan](#). The Commonwealth’s [Rural Policy Plan](#) released in late 2019 also contains recommendations for improving mobility in rural areas in the state which can be incorporated into the plan. Most of the MART communities are classified as rural.

Also not covered explicitly in the Plan is the [One North Central A Roadmap for Regional Prosperity](#) published in 2021 by the Chamber of Commerce which stated:

“Transportation connectivity, reliability, and safety are critical to the long-term economic vitality of the region. The Chamber should work with local and regional partners to advocate for transportation improvement projects that will open access to developable areas, ease congestion, improve safety, advance multi-modal access, and address transportation equity issues.”

Covering climate in a regional transportation plan requires much more than a discussion of Electric Vehicles and culvert replacements. We need to address the mobility issues that will help decrease vehicle miles traveled in all our communities. We also need to address climate resiliency which not only includes brick and mortar issues such as replacing undersized culverts but also addresses people’s transit needs in climate emergencies. How do people without access to vehicles get to cooling centers in summer or evacuation or warming centers during ice storms in winter?

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<p><b>Lack of Details on Mobility and Transit Planning</b></p> <p>The vagueness around climate and transit goals stand in stark contrast to many of the specific dollar amounts for roads, bridges, garages, and office facilities. (See Table 7-3.) A Ridership Demographics Study would be key to helping develop an effective transportation plan for the region that could help reduce GHG emissions as well as provide much needed services to all our residents. Yet there is not even a very rough estimate on what that might require. The document lists N/A. Does that mean Not Available? Not Applicable? Every other item in the table has a very specific dollar figure. The plan needs to have a rough cost (even a broad range) on this much needed Ridership Demographics Study. To truly serve our region's needs, this study must be inclusive with extensive input from the people living in our region. Projected cost should include funds for participation, transportation, translation, and childcare for people to participate.</p> <p>Another interesting thing about this table (7-3) is that it is labeled as "Transit Recommendations" but only the top one (with the N/A cost) is related to directly providing transit services to people. The others relate to transit facilities for parking, offices, fuel stations including one for electric vehicle recharging. Where are the costs for new buses and other transit vehicles? Where are the costs for software programs that might be needed to address the issues raised in the demographic study?</p> <p><b>Population projections and how they relate to the plan</b></p> <p>The specific comments below address issues raised by population projections included in the report. It is unclear how MART and others use these population projections in their planning work. Please note that the Rural Policy Plan has as a top priority boosting population in rural areas of the state. Also note the 2022 Climate Assessment identified Central MA as a receiving area for in state and out of state climate migrants. It would be a shame if the decreasing population figures quoted in the report were to negatively influence the public investment needed to address our very real needs.</p> <p>The rest of these comments include recommendations and suggestions for specific parts of the document. Please let me know if you have any questions or need clarification.</p> <p><b>Executive Summary</b></p> <p>The Executive Summary should pull out the highlights and conclusions from each chapter so that policy makers, residents, and businesses have an easy to access and understand summary of the plan without diving deep into each chapter. Much of the current Executive Summary just describes what is covered in each chapter and requires the reader to wade through the chapters to find the information on their own. Making the Executive Summary more complete and user friendly will enhance the effectiveness of the plan.</p> <p>On page 1 of the Executive Summary document, there is a mistake which is repeated other places in the report. "The Region was settled as early as the 17<sup>th</sup> Century and began as small settlements that moved from an era of agrarianism into the age of industrialization and now into the era of information and communications."</p> <p>This statement erases the history of Indigenous Americans who established settlements and made trail connections in the region 10,000 to 12,000 years prior to the colonization by Europeans in the 17<sup>th</sup> century. Some of their descendants still live in the region today. It's estimated that prior to the 13<sup>th</sup> century, there were about 100,000 Native Americans in New England. The Indians initially followed deer trails but also created other trails to connect communities to each other as well as hunting areas and sources of water. European colonizers used these trail networks. Some of the trails have become our roadways. (<a href="https://www.umass.edu/greenway/NETrails/5NET-his1.html">https://www.umass.edu/greenway/NETrails/5NET-his1.html</a>).</p> <p style="text-align: right;">3</p>	<p>A quick fix to the report could be to replace "settled" with "colonized by Europeans." A more inclusive fix would be to acknowledge the members of the Abenaki and Wabanaki Confederacy that lived in the region, set up the original trail connections and provided many of the place names we still use in the region.</p> <p>Rather than provide detailed comments on other parts of the Executive Summary I will focus my comments on the associated chapters in the main report.</p> <p><b>Chapter 2 – Vision Statement, Strategies and Objectives</b></p> <p>The vision statement on page 1 is excellent. The region needs the aspirational outlook to enable the much-needed planning, investment, and implementation to achieve this vision, hopefully, much sooner than the 2050 timeframe identified.</p> <p style="text-align: center;">Vision Statement: Aspirational view of the regional transportation system in 2050</p> <div style="border: 1px solid black; padding: 5px; margin: 10px auto; width: fit-content;"> <p>"The Montachusett Metropolitan Planning Organization seeks to provide a multimodal and inclusionary transportation system that is safe, secure, efficient and affordable to all individuals while supporting and encouraging environmentally-sustainable economic development, growth, and revitalization in the Montachusett Region."</p> </div> <p><b>Goal 2 on page 2 (Goal 2 - Reduce Congestion and Improve Mobility)</b> Add a third bullet point to Objective i: (Monitor and promote and identify projects that address congested roadways within the Region.)</p> <p><b>*Explore public mobility options that will help limit the number of single occupant vehicles.</b></p> <p><b>Add a second bullet point to Objective ii: (Increase travel options within the region through the promotion of trails, Complete Streets, transit, land use and their interactions.)</b></p> <p><b>* Facilitate cooperative projects that address mobility issues across municipal lines</b></p> <p><b>Goal 3 on page 3.</b> These goals, objectives and strategies are all excellent and much needed in our region. I particularly the last bullet in Objective 2.</p> <ul style="list-style-type: none"> <li><b>Actively examine options such as micro transit, Transportation Management Associations, etc. that can expand services to more remote areas.</b></li> </ul> <p><b>Goal 4 on page 3.</b> Add a bullet point to the 2<sup>nd</sup> objective (ii. Encourage communities to seek funding and implementation of projects through the Transportation Improvement Program (TIP) process as well as other applicable federal and state programs.)</p> <p><b>*Facilitate communication and planning for regional projects that many cross municipal and/or Regional Planning Organization boundaries.</b></p> <p><b>Goals 5 to 7 on page 4</b> are also excellent and much needed in our region.</p> <p style="text-align: right;">4</p>
<p>In goal 5 Strategy 1, you should add "transit" and "access to cultural resources" to reflect the growing wealth of cultural institutions in our region that would benefit from better connections.</p> <p><b>* Establish and prioritize major trail and transit connections for commuters, access to cultural resources and recreational purposes throughout the region and beyond.</b></p> <p>In Goals 6 and 7, it's important to note that these two strategies are critical in helping communities reduce their Greenhouse Gas emissions.</p> <ul style="list-style-type: none"> <li>Goal 6, Strategy 3: * Promote and encourage a shift from single occupant vehicles to transit, bicycle and pedestrian modes through improved transit, van/carpool and trail options.</li> <li>Goal 7, Strategy 3: * Promote programs and projects that support the reduction of single occupant vehicles.</li> </ul> <p><b>Chapter 3 Performance Measures</b></p> <p>It would be very helpful to have a table that shows the Goals, Objectives and Strategies from Chapter 2 and adds a column for Performance Measures. This would enable readers to better connect the measures to the intended strategies. This table should be created and pulled out into the Executive Summary as well.</p> <p>I would like to see more specific performance measures that would support climate and justice goals and objectives identified. If there aren't specific performance measures, these objectives risk being left unaddressed.</p> <p><b>Page 4-5,</b> add a Performance Measure for both Goal 2 (Reduce Congestion and Improve Mobility) and Goal 3 (Promote and Seek Equitable Transportation for All).</p> <p><b>*Draft Ridership Demographic Study completed by ____.</b></p> <p><b>On Page 5, Goal 5,</b> another performance measure could address the issue of tourism. Here's one example of what could be added:</p> <p><b>*Review and analyze at least 3 transit corridors that could connect commuter rail to cultural and recreational tourism destinations in the region</b></p> <p>Another Performance Measure should be added to page 5, Goal 7 to reflect the real need to reduce Green House Gas (GHG) emissions on a regionwide basis.</p> <p><b>*Analyze GHG emissions on a regionwide basis and track changes periodically (every 2-3 years?)</b></p> <p><b>Chapter 4.1 Demographics</b></p> <p>On page 2 the wording needs to acknowledge Native American as the original settlers of the area as described in the Executive Summary chapter.</p> <p>Thank you for pulling together all the population and demographic projections. I was a bit surprised to see the leveling off and then decreasing population across the region for 2050. I know much of our region lost population in the 2000–2010-time frame. As the report identifies, the 2010 to 2021 period showed a 5.6%</p> <p style="text-align: right;">5</p>	<p>growth. I do not have time to look up and understand the assumptions the Donahue Institute used in their projections. It would be good to better understand those so we can be sure we are adequately planning for future population growth. The Donahue Institute has this disclaimer on their website:</p> <p style="margin-left: 20px;"><i>In general, projections for small geographies and distant futures will be less predictive than projections for larger populations and near terms. Like all forecasts, the UMDI projections make assumptions about how past or recent trends will continue into the future.</i> <a href="https://donahue.umass.edu/business-groups/economic-public-policy-research/massachusetts-population-estimates-program/population-projections">https://donahue.umass.edu/business-groups/economic-public-policy-research/massachusetts-population-estimates-program/population-projections</a></p> <p>Since we are a "small geography" and our planning timeframe is a "distant future," it would be prudent to seek funding or a partnership to better understand the expected population growth in the region. I noticed the One North Central study completed by Chamber of Commerce referred to a current growth rate of 4% which they expected to level. That study did not mention a decline.</p> <p>Please note that the <a href="#">MA Climate Assessment</a> predicts that Central MA will likely be a receiving area for in-state and out-of-state climate migrants. That study region is larger than our MRPC area, but we know that previous waves of migrants settled in the small urban areas (Gateway Cities) in our region (Fitchburg, Leominster, Gardner). We also know that our region has already seen climate migrants in the last twenty years. Please also note that the Commonwealth's Rural Policy Plan has as a top priority boosting population in rural areas of the state. There needs to be some discussion about these reports.</p> <p>On page 10, you reported on the demographic changes based on race in the 2000-2021 period.</p> <ul style="list-style-type: none"> <li>The number of Hispanic residents grew from 15,672 to 30,156 (+92.4%)</li> <li>The number of residents who self-identified as Black or African American alone grew from 6,127 to 13,082 (+113.5%)</li> <li>The number of Asian residents grew from 4,098 to 8,368 (+104.1%)</li> <li>The number of residents who identified as two or more races increased from 4,127 to 14,575 (+65.4%)</li> </ul> <p>On page 28, the report states, "An important counterpoint to the very likely possibility of future changes in migration, however, is that the strongest predictor of future population in almost all places is the population residing there today." Since Hispanics, African and Asian people are expected to be some of the most affected by climate impacts in the Global South and Island Nations, it's important to include climate migration in the report.</p> <p>Other topics that should be covered in the demographic profile include:</p> <ul style="list-style-type: none"> <li>The regeneration of old mill buildings and other underutilized properties into housing, particularly in the Gateway cities.</li> <li>A movement to the region from places in Eastern MA due to the affordability of single-family homes in the region or a desire for a better quality of life.</li> <li>Location of existing and potential shelters and transitional living spaces.</li> <li>Location of existing and plans for additional aged 55+ developments.</li> <li>Transformation of cottages and seasonal homes into year-round living.</li> </ul> <p style="text-align: right;">6</p>



<p>Another piece of demographic data that would be very interesting to see is the number of driver license holders and car owners by age category and community and how that has changed over time. It seems more and more younger people are choosing not to drive and/or own cars. On the other end of the age spectrum, seniors often decide to stop driving at a certain age. Both of these age groups can suffer from problems due to isolation so it would be helpful to know this piece of demographic information as well.</p> <p>In the discussion of Employment, it would be good to understand not only the Employment by Industry in the Region (Table 4.1-17) but also the <b>location</b> of employment by the region. Additionally, it would be good to know the location of higher education, employment and training programs as well. <b>Our 2050 plan must address getting people to where the jobs education, and training currently exist now and where they will exist in the future.</b> Access to health care facilities is another key issue that needs to be analyzed. What new demands will the proposed closing of the Labor and Delivery Unit at Leominster Hospital put on our already stressed system?</p> <p>Finally, it would be useful to understand the location (and hours of operation if appropriate) for cultural organizations, farms, and other recreational opportunities. This would provide data on where people from outside the region may want to visit as well as where locals may find employment in this sector.</p> <p><b>The Recommendations on page 35 leave out two critical groups:</b></p> <ul style="list-style-type: none"> <li>• <b>Low-income residents</b></li> <li>• <b>Non-drivers</b></li> </ul> <p>As the data presented earlier in the chapter indicated, the region has significant low-income needs.</p> <ul style="list-style-type: none"> <li>• 18 of the region's 22 communities have a lower per capita income than the state (\$48,617) and 8 (Athol, Clinton, Fitchburg, Gardner, Leominster, Petersham, Phillipston and Winchendon) rank below the state in median household income (Fig 4.1-9)</li> <li>• 6 Communities have a higher concentration of poverty than the state (9.9%) as a whole. Fitchburg (14.6%), Gardner (14.1%), Winchendon (11.4%) and Athol (11.1%) are near or above the National average of 11.3%. (Fig. 4.1-10)</li> <li>• 3 Communities (Clinton, Fitchburg, and Gardner) have more renter occupied units than the state and federal averages. (Fig 4.1-13)</li> <li>• More than 25% of owner occupied households are cost burdened in 18 of the 22 communities. (Fig. 4.1-6)</li> <li>• More than 25% of renter-occupied households are cost burdened in 19 of the 22 communities. In 9 of those communities, more than 50% of the renter-occupied households are cost-burdened. (Fig 4.1-6)</li> </ul> <p>Owning and operating a car is a big expense. People living in areas with reliable and affordable transit options can save money by not owning a car or in the case of two income households, owning just one car. I'd suggest adding two additional recommendations after #2 on page 35 to address these needs:</p> <p><b>*Identify and prioritize projects that assist low-income members of the community throughout the region. This would include better sidewalks, improved access to transit options, and eliminating gaps in the network that prevent or discourage usage. Initial focus could be on the communities which rank highest in identified income-based need (Athol, Clinton, Fitchburg, Gardner, Leominster, Petersham, Phillipston and Winchendon)</b></p>	<p><b>*Identify and prioritize projects that assist non drivers in communities throughout the region. This would include an analysis of car ownership and license holding by age in the communities.</b></p> <p>Finally in Recommendations number #4 on page 35, please add "transit options" after bicycle networks:</p> <p><b>*Expansion of mode options for commuters needs to also be a priority for the region. This would also involve the region's trail/pedestrian/bicycle networks and transit options. These systems can be improved and expanded to provide additional walking and biking mode options.</b></p> <p><b>Chapter 4.5 Economic Vitality</b></p> <p>It was interesting to see such a focus on "access to freight" in the discussion of the 10 Opportunity Zones in our region, particularly for the Opportunity Zones situated in core in-town neighborhoods. Movement of goods (freight) is only one piece of the economy. <b>Movement of people is also critical.</b> What have the Opportunity Zone communities identified as important? More importantly, what do the people living in the Opportunity Zones want? Have any of the 10 Opportunity Zones in our region done any planning about these issues?</p> <p>There also needs to be an expanded section on tourism. It would be helpful to better understand the existing location of potential tourism destinations that might be served by better access. This should our wealth of natural, historical, and cultural resources. The openings of the Groton Hill Music Facility in the eastern part of our region and the Winchendon Amphitheatre in the west are just two recent examples of the investment in culture in our region. Many more examples exist.</p> <p>I would suggest edits to two of the recommendations to address these concerns. (Red edits)</p> <ul style="list-style-type: none"> <li>• <b>Continue to seek to improve external and internal freight truck access for the 10 Opportunity Zones where appropriate and desired. Also explore other transit and mobility needs in the 10 Opportunity Zones.</b></li> <li>• <b>Continue to seek to improve external and internal access to the regional recreational destinations including parks, farms, festivals, historical sites, and cultural institutions.</b></li> </ul> <p><b>Chapter 4.6 Congestion</b></p> <p>Removing single occupant vehicles from roadways is a congestion remedy which will also help address our GHG emission reduction needs.</p> <p>Add a recommendation on page 23-24.</p> <p><b>* Proactively study areas of high congestion to determine possible mobility options that might help reduce congestion by decreasing the number of single occupant vehicles.</b></p>
<p><b>Chapter 4.7 Transit</b></p> <p>I strongly agree with this statement in the first paragraph of this chapter: "Expansion and continued improvements to the transit system will continue to be a major factor in the overall goal of reducing the number of single occupant vehicles (SOV)"</p> <p>I was surprised to learn on page 2 that a private for-profit management company operates the fixed route, paratransit, and subscription services for our region. The <a href="#">MA Secretary of State's listing for Management of Transportation Services, Inc.</a> shows only one officer for the company based in Arizona. There is a local agent listed with an address of MART's Water Street location. Why does MART use a private for-profit firm which appears to be based in Arizona?</p> <p>I was also surprised to see no mention in the report of two regional services that started this year:</p> <ul style="list-style-type: none"> <li>• Service from Townsend to Fitchburg</li> <li>• Service in Lancaster, Lunenburg, and Sterling</li> </ul> <p>The needs identified that led to these services should be covered.</p> <p>The page 18 recommendation to lift the age requirement and expand service hours to make better use of existing Council on Aging vehicles could be one way to help provide better service in communities. More discussion is needed about other constraints related to their use and how these can be addressed.</p> <p>The recommendation to expand MART's communication strategies is a good one. In addition to building its presence on traditional and social media, MART should reach out to schools, churches, health care facilities and community centers to offer outreach and training on accessing services. Outreach should be available for all the major languages spoken in our region.</p> <p><b>Table 4.7-20: Recommended Programs/Projects</b> starting on page 19 raises several comments and concerns.</p> <p><b>A Ridership Demographic Study is much needed in the region.</b> To be truly effective and help drive the changes in the system our region needs, the study must go beyond where the existing ridership is and where they want to go. It should also involve much more than "MART and its Operating Company." As I've indicated in the comments on Demographics, Economic Vitality and Congestion sections, there are unaddressed future needs we must better understand. A Ridership Demographics Study would be key to helping develop an effective transportation plan for the region that could help reduce GHG emissions as well as provide much needed services to all our residents. This study should involve a broad range of participants and be guided by an outside firm with expertise in this work.</p> <p>It's very concerning that the table lists the cost of this study as N/A. Does that mean Not Available? Not Applicable? Some research into regions who have done this work or a few calls to consultants who did their studies could provide some sort of ballpark estimate to include in the plan. Every other item in the table has a very specific dollar figure. The plan needs to have a rough cost (even a broad range) on this much needed Ridership Demographics Study. To truly serve our region's needs, this study must be inclusive with extensive input from the people living in our region. Projected cost should include funds for participation, transportation, translation, and childcare to enable people to participate.</p> <p>Another interesting thing about this table is that it is labeled as "Transit Recommendations" but only the top one (with the N/A cost) is related to directly providing transit services to people. The others relate to transit facilities for parking, offices, fuel stations including one for electric vehicle recharging. Where are the costs for</p>	<p>new buses and other transit vehicles? Where are the costs for software programs that might be needed to address the issues raised in the demographic study?</p> <p>I was surprised to see the requested funds for \$5 million for a Hydrogen Fueling Station at the MART Water Street Facility. What is the status of this project? Why would we spend funds for Hydrogen Fueling rather than moving to an all-electric vehicle fleet? There are increasing climate concerns about the use of <a href="#">hydrogen fuels</a>. It's also worth noting that the MART Water St. Facility is in the middle of an EJ neighborhood. I'd like to see more information provided on this project including expected increased traffic and emissions in the EJ neighborhood.</p> <p><b>Chapter 4.8 Environment</b></p> <p>Thank you for highlighting the climate impacts our region is likely to face. As pointed out, our region will experience more frequent damaging floods such as those in Fitchburg last week. It was nice to see the discussion and maps of potential dams, roads and bridges in the 100-year flood areas identified. There are many more potentially threatened resources. The plan should make note that the FEMA mapped areas do not reflect the more frequent, short intense storms we are now experiencing. Also, the <a href="#">Department of Ecological Restoration</a> has raised the concern that more than half of culverts and small bridges in the state are undersized to handle the extreme rainfall events associated with climate change. This plan should include discussion on both these issues.</p> <p>Addressing environmental and climate concerns requires more than a focus on Electric Vehicle (EV) Charging Stations. While EV's will be an important part of our clean energy future, we also need to address strategies to provide alternatives to personal vehicles. The first transportation strategy in the <a href="#">MA Clean Energy and Climate Plan</a> is to "Promote Alternatives to Personal Vehicle Travel." As was recently reported in <a href="#">The Atlantic</a>, EV's still contribute particulate matter from brake and tire wear, so it would be prudent to reduce EV miles traveled as well.</p> <p>The Transportation sector accounted for 42% of MA Greenhouse Gas (GHG) emissions in 2019, according to the <a href="#">MA Clean Energy and Climate Plan</a>. Our plan needs to address mobility strategies and performance measures related to providing alternatives to personal vehicles. The <a href="#">Rural Policy Plan for the Commonwealth of MA</a> has some transportation recommendations that might be useful for the many rural communities in the MART service area.</p> <p><b>Chapter 5 – Public Outreach</b></p> <p>Thank you for providing the notes and information on the public outreach provided. I participated in the February 16<sup>th</sup> Meeting. I may have participated in others if I had known about them. In the recommendation section on page 22, I agree that more outreach and analysis must be done to fully address the goals of the Montachusett Region. I would suggest adding more specific action items that would address how and when MRPC will identify, contact, and engage the various groups needed to provide input into a comprehensive transportation plan.</p> <p><b>Chapter 6 – Transportation Equity</b></p> <p>As described on Page 1,</p> <ul style="list-style-type: none"> <li>• <b>Transportation and social equity</b> is a civil and human rights priority and major goal for the Montachusett Region. It requires making investments that provide all residents - regardless of age, race, color, national origin, income or physical ability - with opportunities to work, shop, be healthy, and play.</li> </ul>



<p>Measuring this requires more than an analysis of where road and bridge expenditures occur. What about an analysis of transit routes and ridership? Access to walking trails and sidewalks to transit facilities?</p> <p>In the recommendations on page 10, I'd suggest again adding more specific action items that would address how and when MRPC will identify, contact, and engage the various groups needed to provide input into a comprehensive and equitable transportation plan. An additional action item should address how MRPC will help address language and other barriers that may exist.</p> <p><b>Chapter 7 – Regional Trends and Recommendations</b></p> <p>My previous comments suggested changes to trends and recommendations from each of the previous chapters. My comments on Table 4-7.20 are applicable to Table 7-3. These should be included in this chapter as applicable.</p> <p>I provided comments about the Ridership Demographics Study in my comments on Chapter 4.7 Transit. The entire region would benefit from a broader mobility study that addresses <b>transportation and social equity</b> which is a "civil and human rights priority and major goal for the Montachusett Region." This would look at current and future housing in the region and how residents will have access to "opportunities to work, shop, be healthy, and play." It should also address how we provide opportunities to work, shop, be healthy, and play for people who may travel to our region.</p> <p>The discussion of "marketing effort" on page 19 reminded me of an old comparison of marketing vs. selling: "selling is getting rid of what you have while marketing is having something that people want to have." Using this example, I view the Action Item of a marketing effort to "inform the public of transit availability and efficiency" as a selling of what we have. The much-needed Ridership Demographics study which I'm suggesting we expand could help provide our region with a transit system our residents want to use.</p> <p>On page 20, under Environmental Action Items, it would be helpful to better understand what "environmental factors" are considered when "reviewing and prioritizing transportation projects." Also, the plan should add action items related to monitoring and reducing transportation related GHG emissions across the region.</p> <p>On page 20-21, it is hard for me to judge "extensive outreach" without better understanding what specific outreach activities were undertaken. Stating that "a lot of the respondents who were seniors and/or retired so this may have impacted the outcome," illustrates that the outreach was not broadly successful. In discussions on transportation needs at the CHNA9 Community Charettes I attended (Clinton, Townsend, Winchendon, Leonminster) I did not hear "unique transportation needs" from people from each of the participating communities (which included not just those communities but surrounding areas). I heard some general needs for more rural areas (where there is almost no public transit) compared to urban areas where there is some existing transit. For example, people in more rural communities want to be able to access places in their own communities as well as reach the transportation hubs in the more urban areas. This statement on page 20 is a good summary of our situation here in North Central MA.</p> <p><i>It seems that transportation alternatives are still needed and the ones that currently exist may not meet the needs of most of the survey respondents.</i></p> <p>One challenge is creating systems that meet the needs of all our residents.</p> <p>Pages 24-26 provide some great information on statewide transportation trends and recommendations. It's unclear to me how these relate to and have been incorporated into the plan.</p>	
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<p><b>Chapter 8 – Planning Scenarios</b></p> <p>I would like to suggest another Planning Scenario which is a hybrid of Multiple Hubs and Strong Community Centers. This seems to be what most desire based on my recent listening experience at the CHNA9 Charettes as well as my many decades of lived experience in the region. People want strong opportunities to connect in their own communities as well as ways to connect to regional hubs of activities. It's also important to note that people want all mobility connections (walking, biking, transit, cars) within and between communities.</p> <p>Thank you very much for taking the time to read these long comments. We are at an important point in our history. We need to address problems today to create the healthy and safe region we desire for 2050. In MA, 42% of our GHG emissions are transportation related so our 2050 Transportation System will be a critical part of reaching our 2050 NetZero goals. I plan on attending the Wednesday MPO meeting and would be happy to address any questions you may have there.</p> <p>Kind regards, Carolyn Sellars</p>	
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