



June 24, 2015

Stephanie Pollack, Secretary and Chief Executive
Massachusetts Department of Transportation
10 Park Plaza
Boston, MA 02116

Re: Update of the Capital Investment Plan

Dear Secretary Pollack:

The Association to Preserve Cape Cod (APCC) thanks you for providing us the opportunity to comment on your draft one year FY2016 update to the previously published FY2014-FY2018 Capital Investment Plan of the Massachusetts Department of Transportation (MassDOT). This is the first opportunity for the Baker administration to articulate a vision and the administration's priorities for transportation infrastructure in Massachusetts. While we recognize the plan "does not yet fully reflect potential changes to MassDOT's investment priorities," the plan is not as "ambitious and wide-reaching" as professed. APCC asks that the final plan reflect a more systematic approach to the total transportation system that reflects good stewardship of the environment as well as efficiently moving people from point A to point B.

Founded in 1968, APCC is the Cape Cod region's leading nonprofit environmental advocacy and education organization. Representing more than 5,000 members, APCC's mission is to preserve, protect and enhance the natural resources of Cape Cod. APCC focuses its efforts on the protection of groundwater, surface water and wetland resources, the preservation of open space, the promotion of responsible, planned growth, and the achievement of an environmental ethic.

APCC requests consideration of these specific comments and suggestions:

Complete Streets: APCC notes that in the Draft Capital Investment Plan, MassDOT indicates it "will be making use of transportation-dedicated funds generated by the Commonwealth's gaming initiative (MGL Chapter 23K, Section 62). \$12.5 million of these funds will make possible the implementation of a new Complete Streets program—a capital effort, but carried in the MassDOT operating budget—to support cities and towns in the design and construction of roadways that accommodate all users and modes."

Although APCC acknowledges the above-referenced MassDOT document's purpose is to present a one-year update of the capital investment plan for the 2016 fiscal year and is not meant as a general MassDOT policy document, we wish to use this opportunity to comment on the Complete Streets program. The philosophy behind Complete Streets is forward-thinking in its attempt to provide greater access to the Commonwealth's roadway system for bicycle and pedestrian use. This is particularly important in urban and urban/suburban environments where it is advantageous to de-emphasize auto use and to encourage and accommodate other means of travel.

However, in going forward with the Complete Streets program, APCC encourages MassDOT to be mindful and sensitive to the fact that “one size” does not fit all roads, all communities or all situations. In the Cape Cod region, APCC is aware of several recent road projects in which MassDOT funding assistance came with the requirement that the regional, rural characteristics of the roadways in question be fundamentally compromised in order to comply with Complete Streets. Such requirements appear at times to be inflexible to the reality that Truro is not the same as Somerville, or that Main Street in Brewster is different than Main Street in Springfield.

A community’s roadways are an important and very visible feature of that community’s identity; the question is whether the contribution they make in helping shape that identity is a positive one or a negative one. Although MassDOT has adopted specific road design objectives for its Complete Streets program, the environmentally sensitive surroundings, historical heritage, rural ambience, traditional character and physical practicalities that make up a community should also weigh heavily when undertaking future road projects. Indeed, such considerations are required by federal transportation guidelines. Protecting community character is an explicit federal goal. APCC urges Mass DOT to work more closely with communities, and to be more flexible and imaginative in creating roadway designs that will preserve and even enhance community and regional interests while still achieving many of the worthy objectives of the Complete Streets concept.

Stormwater Management: Cape Cod has a serious nutrient problem impacting not only our groundwater but every embayment, pond and stream. According to the Clean Water Act Section 208 plan, stormwater and fertilizer runoff accounts for approximately 20 percent of the controllable nitrogen and is the primary delivery vehicle for the deposition of atmospheric nitrogen to groundwater, streams and embayments. Cape Cod is not unique in the challenges it faces related to stormwater management. MassDOT has been slow to incorporate best management practices into its stormwater arsenal as well as into its capital planning. Recent transportation projects on Cape Cod have failed to incorporate best management practices into stormwater upgrades. Stormwater management needs to be more than removing water from travelways. APCC could find no mention of stormwater or stormwater management anywhere in the plan. Every project needs to include best management practices as defined by the Environmental Protection Agency. We know that treating pollution at its source is far cheaper than dealing with it at its destination. On Cape Cod, MassDOT can be an important part of the solution and not, as it is now, part of the pollution.

Vegetation Management: MassDOT suffered a public relations debacle in its handling of vegetation management along the Route 6 corridor in Sandwich. The unnecessary clear cutting served no public purpose and did nothing to promote public safety. Indeed, some opined that it made the public less safe because of an increased chance of head-on collisions and distraction from on-coming headlights. Unlike the winter storms of 2015 where Mother Nature played a major role in generating bad press, the Route 6 action was completely self-inflicted by MassDOT. Vegetation management is a key role of transportation infrastructure and aesthetics. MassDOT does not appear to have adopted modern vegetation management that works in harmony with stormwater management to promote a lower maintenance transportation system that at the same time provides ecological value. Meadowsclaping, use of native plants and

selective native tree planting are integral to safe and aesthetically pleasing travelways. Vegetation management needs to be fully integrated into MassDOT's capital planning.

Canal Crossing: MassDOT has taken an unusual route to deal with safety deficiencies associated with the Cape Cod Canal crossings. There appears to be no mention of the crossing study currently underway in this update of the capital plan. APCC is concerned that the MassDOT Canal planning has jumped out ahead of both the need and responsibility for crossing improvements. MassDOT promoted a public/private partnership (P3) initiative to build a third bridge even before responsibility for upgrading or replacing the existing bridges was established. Subsequently, the Corps of Engineers acknowledged responsibility for bridge replacement. The need is not to bring more cars and trucks to Cape Cod; it is to bring them more safely with added flexibility to carry out bridge maintenance. MassDOT appears to be focused on a mid-canal third bridge based solely on P3 desirability. This location would require alteration of environmentally sensitive and protected land on both sides of the canal. APCC actively serves on the working group and for the past year that group has not been asked to do any work just listen to MassDOT consultant reports. Because of this, it appears that public engagement may simply be illusory. At this point APCC is especially concerned about the capital planning process MassDOT has taken for this the potentially largest transportation capital project directly impacting Cape Cod.

Thank you for your consideration. APCC hopes that our concerns will be addressed when the Baker administration is able to fully articulate its transportation investment priorities.

Sincerely,

A handwritten signature in black ink, appearing to read 'Edward J. DeWitt', with a long horizontal flourish extending to the right.

Edward J. DeWitt
Executive Director