



October 22, 2018

Jen Slesinger  
Focus40 Project Manager  
MassDOT Planning  
10 Park Plaza, Suite 4150  
Boston, MA 02116

**Re: NAIOP Comments on *Focus40: The 2040 Investment Plan for the MBTA***

Dear Ms. Slesinger,

NAIOP Massachusetts, The Commercial Real Estate Development Association, appreciates the opportunity to submit comments on *Focus40: The 2040 Investment Plan for the MBTA*. NAIOP represents the interests of more than 1700 members involved with the development, ownership, management, and financing of more than 250 million square feet of office, research & development, industrial, multifamily, mixed use, and retail space in the Commonwealth.

In 2015, at the start of the Baker-Polito Administration, NAIOP issued the report, *From Good to Great: Recommendations for the Baker-Polito Administration*. The report included recommendations on a wide range of policy areas, including transportation. Specifically, NAIOP urged the Administration to develop a "Vision 2040 Transportation Plan," which "should address tomorrow's opportunities, focusing on the issues which may arise over the next 25 years, including long term demographic, economic, environmental, technological, cultural and governmental transformations, the potential effects of global climate change on infrastructure, and the development of new modal choices."

NAIOP believes that Focus40, combined with the Administration's Commission on the Future of Transportation in the Commonwealth, and ongoing initiatives such as Rail Vision, as well as the significant work done by the Fiscal and Management Control Board, will achieve this goal. By focusing on the three tiers of Doing, Planning and Imagining, Focus40 identifies investments that will make the MBTA a more reliable, robust and resilient public transportation system.

Focus40 identifies 12 key programs: Blue Line 2040, Orange Line 2040, Green Line 2040, Silver Line 2040, Red Line 2040, Resiliency, Customer Experience, Paratransit, Commuter Rail 2040, Water Transportation 2040, Bus 2040 and Place Based Service Additions.

Overall, NAIOP supports these focus areas as well as the short, medium and long-term goals recommended for each program. The following comments focus on areas where NAIOP believes the MBTA can expand upon the proposed recommendations:

- **Water Transportation:** In the current draft, an identified program objective for 2040 is “supporting a robust, multi-operator Boston Harbor water transportation system, serving more passengers and destinations and excellent connections to landside MBTA service.” NAIOP believes that water transit has significant potential and that Focus40 provides a unique opportunity to further investigate how waterfront communities, including Boston, could benefit from an expanded system. In addition to the Hingham and Hull ferries to Boston, Focus40 should identify destinations that could be added for 2040, as well as methods to select and prioritize potential sites. As an example, an expansion of the existing Charlestown to Long Wharf route so that it connects to the Seaport and East Boston could have significant benefits to residents and businesses in rapidly expanding neighborhoods.

Second, as the MBTA looks at improving and expanding service for ferry passengers, it should continue to invest in vessels that are right sized for the route, both in terms of passengers and engine power. Third, the repeated references to a “multi-operator system” need clarification to better understand the ultimate goal.

Finally, NAIOP urges MassDOT to include input from the business community as a critical component of the *Comprehensive Boston Harbor Water Transportation Study* now underway. NAIOP looks forward to being part of that process.

- **Ride Sharing and Technology:** While references to ridesharing are made under the Customer Experience program recommendations, NAIOP suggests that detailed analysis about the current and future impact of ride sharing services, e.g. Uber, Lyft as well as other technologies be included. In addition to offering an alternative or complement to MBTA service, these companies are changing the composition of our streets and the level of congestion in many areas. New and “disruptive” technologies are already impacting transportation and should be considered, making enhanced transportation information sharing through technology an integral part of the Commonwealth’s transportation plan. This trend would probably fit well within Technology - one of the four trends considered in the draft Focus40 plan, along with Urbanization, Affordability, and Climate Action.
- **Regional Needs:** Considering how the program objectives and recommendations might affect access to other parts of the Commonwealth should be further investigated in Focus40. While we acknowledge that the MBTA is first and foremost the public transportation system for Boston and surrounding communities, we think that it’s

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necessary to zoom out and look at outside factors that may interact with the MBTA lines. Two examples that could be considered include commuter rail extensions that may better serve residents living outside Eastern Massachusetts and expanded parking at these stops.

- **Non-Capital Priorities and Human Resources Planning:** While it is important to have goals and big ideas to guide large investments, the essentials of good MBTA administration are absolutely critical. The transformational work of the Fiscal and Management Control Board over the past three years illustrates this very clearly. It is imperative that the big ideas in Focus40 do not overshadow the vital day to day needs and expectations of the region. We recommend that Focus40 consider how human resources planning and operational strategies will allow this to continue.

NAIOP applauds the Baker-Polito Administration for the significant time and thought that went into Focus40. A reliable public transit system is critical for sustained economic growth and this report provides the needed framework for the Commonwealth.

We appreciate the opportunity to provide comments on the draft report. Thank you for considering our comments. Please contact me if you have any questions.

Sincerely,



Tamara C. Small  
Senior Vice President, Government Affairs  
NAIOP Massachusetts, The Commercial Real Estate Development Association

Cc: Secretary Stephanie Pollack, MassDOT  
Katherine Fichter, Assistant Secretary for Policy Coordination, MassDOT