Dear Administrator Gulliver:

On behalf of the approximately 300 member companies of the Trucking Association of Massachusetts (“TAM”), I am writing in strong support of Concept C-2, as drafted, for the I-495 / I-90 Interchange Improvements Project (MassDOT #607977). This proposed construction plan appears to best combine the public safety, environmental and mobility needs of the trucking community.

As you know, TAM has been the voice of the trucking industry in Massachusetts since 1919. One of the oldest transportation associations within the Commonwealth, we represent a wide variety of companies ranging from small, family owned trucking companies with a single truck to large national trucking companies with thousands of trucks. The trucking industry within the Commonwealth is responsible for transporting 87%-93% of all goods and products found in our homes and workplaces. In addition to being a key facilitator for the growth of other industries, the trucking industry is a significant creator of jobs within the Commonwealth. As a recent study by the Dukakis Center for Urban Research & Policy at Northeastern University stated “[t]he overall trucking industry (including private and for-hire trucking) represent about one in 12 jobs or about 300,000 jobs in Massachusetts in 2017. And, trucking companies meet all Massachusetts freight movement needs.” (“The Importance of the Trucking Industry to the Massachusetts Economy”, Pritchard, R. & Scott, A., (May 2018)).

In Massachusetts, we are a state that not only has national and regional carriers, we have a significant number of businesses, many within the TAM, who rely on their own trucking fleets to meet their operational needs. As a result, the importance of providing safe, congestion-free connectivity for trucking between major points of import/export terminals and the interstate highway system cannot be overstated. TAM applauds MassDOT for tackling the I-495/I-90 Interchange Improvements Project to “improve safety and operational efficiency at the system interchange of these two nationally and regionally significant interstate highways”. (“Briefing for Stakeholder / Public Information”, MassDOT (October 2018)). This interchange is central to the flow of commodities and goods through and into the Commonwealth from every direction.

As drafted, Concept C-2 appears to take the best parts of MassDOT's various concepts and proposals. Not only does the proposal appear to have the lowest user cost ($160M) due to delays during the project, but it will lead to a 69% reduction in user costs for freight-heavy trucks. As importantly, the cost of Concept C-2 appears to be less expensive than the other proposals and leads to the greatest reduction in life-cycle costs
($25M). Operationally, TAM appreciates the fact that proposed Concept C-2 omits left hand entrance ramps and reduces the occasions where traffic must “weave” onto or across a major roadway – thereby reducing the potential for accidents, congestion or environmental impacts. In short, Concept C-2 combines the public safety, environmental and mobility objectives that the trucking industry requires for continuing to do its job carrying goods throughout the Commonwealth.

TAM appreciates the careful consideration and work undertaken by MassDOT to address and balance the needs associated with improving Interchange 495 / Interchange 90. Concept C-2 will provide a simple, meaningful way to improve this vital intersection with the most benefit for the Commonwealth’s businesses and residents. If MassDOT seeks further input from TAM, please do not hesitate to contact me.

Sincerely,

Anne Lynch
Executive Director