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Executive Director

June 7, 2017

Ms. Stephanie Pollack, Secretary
Massachusetts Department of Transportation
10 Park Plaza, Ste. 3170
Boston, MA 02116

RE: Comments on MassDOTs 2018-2022 Capital Plan Update

Dear Secretary Pollack:

On behalf of the Berkshire Regional Planning Commission, we appreciate the opportunity to share our input on the draft 2018-2022 Capital Investment Plan. The CIP Update includes a mix of investments totaling more than \$17.4 billion that will assist with statewide efforts to maintain, modernize and expand the Commonwealth's transportation system. A significant amount of work has gone into developing this plan which should result in financial resources being directed where they are most needed. In reviewing the draft document, we have noticed that funding has been directed to some program areas that we identified in our March 15, 2017 letter; however, project specific funding for a number of projects were not included. These include:

- East Street (Route 9) reconstruction project, Pittsfield
- CSX Bridge Replacement (over Hubbard Avenue), Pittsfield
- Brown Street Bridge, North Adams
- Hubbard Avenue reconstruction, Pittsfield

These projects are of great importance to the region and therefore, reconsideration of these projects in the CIP is requested.

Even though the CIP contains a reliability priority area including funding for interstate and non-interstate pavement, no funding is specifically directed towards pavement management activities. By including this line item, it would cause funding to be directed towards this important activity which is proven to maintain overall conditions of the road network and maximize the road's useful life. Line items and funding should be included in the reliability priority area program table for this important activity.

There is a noticeable difference in funding between Bridge Funding and Municipal Bridge Funding. The magnitude of difference is 40 times greater for State maintained bridges than for local bridges. More funding must be directed towards municipal bridges as current Chapter 90 allocations, even adding the new Small Bridge program, are not sufficient to address the significant cost of bridge repairs.

Within the program budget, MBTA System Upgrades reflect an increase of \$374M, but no similar increases are provided to Regional Transit Authorities. Additional funding is needed for the other 15 transit authorities in the Commonwealth to reduce this inequitable situation, which threatens to have Environmental Justice implications, and provide a comparable level of service.

Similar to the preceding comment, MBTA expansion projects will receive more than \$1.6 billion over the life of the plan. The CIP should direct more expansion funds to all other RTA's.

Absent from the document are the sections focused on equity, both geographic and social. On the CIP project website containing the electronic version of the document, it is noted that these sections are under development. The information that would be reflected in these sections are critical to decision makers as it provides insight on equity of transportation expenditures. Even with the absence of these important sections, a review of the reliability, modernization and expansion investment maps contained in the on-line electronic version of the document provide evidence of the limited investments (inequities) for projects within the western part of the Commonwealth.

With respect to the expansion map, the line depicting the Mohawk Bicycle/Pedestrian trail in Williamstown and N. Adams does not accurately reflect the project's extent. It over-exaggerates the project limits and it seems to reflect a larger portion of the Mohawk Trail byway.

BRPC appreciates the efforts that have gone into the 2018-2022 CIP Update. Should any question arise regarding our comments, please contact us. We look forward to working with you and your staff to implement the CIP projects.

Sincerely,

A handwritten signature in black ink, appearing to read "Nathaniel Karns", with a long horizontal flourish extending to the right.

Nathaniel Karns, AICP
Executive Director