

BERKSHIRE REGIONAL PLANNING COMMISSION
1 FENN STREET, SUITE 201, PITTSFIELD, MASSACHUSETTS 01201
TELEPHONE (413) 442-1521 · FAX (413) 442-1523
Massachusetts Relay Service: TTY: 711 or 1-800-439-2370
www.berkshireplanning.org

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THOMAS MATUSZKO, A.I.C.P.
Executive Director

TO: Transportation and Climate Initiative
DATE: February 28, 2020
SUBJECT: Comments on the use of Potential TCI revenue
FROM: Thomas Matuszko, Executive Director

The Berkshire Regional Planning Commission, BRPC, is the regional planning agency for the 32 municipalities in Berkshire County Massachusetts. In addition, BRPC provides staff support to the Berkshire Metropolitan Planning Organization. BRPC is greatly concerned about the impacts from climate change and continues to monitor the efforts of the Transportation and Climate Initiative, TCI, as a way to reduce Green House Gas, GHG, emissions from the transportation sector.

While our organization is generally supportive of efforts to reduce emissions from trucks and motor vehicles. However, there are still many undefined elements of this initiative and the draft MOU. We are concerned that rural areas will be disproportionately impacted as a result of this effort. Rural areas in general lack transit options available in more densely developed rural areas. The low-density development patterns inherent in rural areas result in longer travel distances and correspondingly more costs to residents.

The overall lack of specificity absent from the MOU makes it difficult to provide detailed comments about the use of potential revenue from this proposed cap and trade program. As these details are determined, we will share more detailed comments.

BRPC is providing the following recommendations for programs that are of interest to the Berkshires but would also be beneficial to other rural areas.

- **Investment in Passenger Rail** - Expanding and improving passenger rail service in rural areas can reduce GHG emissions as well as foster additional benefits.
- **East – West Passenger Rail Service: Pittsfield-Springfield-Boston:** Presently, MassDOT is conducting a planning study for improved connectivity and mobility in the west- east corridor between Boston, Springfield and Pittsfield. Revenue from the emission allowances could pay down the capital costs to expand and enhance this highly desired statewide rail service as well as offset operational costs if necessary.

- North – South Passenger Rail Service: Pittsfield – New Haven - New York City: Past study efforts identified that there is demand for service between Pittsfield and New York City. The state is currently upgrading the rail and ties from the state line to Pittsfield. Revenue can be used to acquire rolling stock and offset operating cost for this service.
- East – West Passenger Rail Service: North Adams-Greenfield-Boston: MassDOT will be conducting a planning study to evaluate service across the northern portion of the state. With Presuming that the study identifies adequate ridership and determines that service is viable along this route, funding from this source could cover startup and operating costs for this northern, east – west rail service.
- Innovative Mobility - Designing and implementing a new, first/last mile ride share service which incorporates micro-transit concepts has great potential for rural areas and it can complement existing transit service. In addition to reducing emissions, it can increase efficiencies and can result in costs savings.
- Enhanced Transit Service - Transit service in rural areas is limited in terms of the number of routes and days/hours of operations. Directing additional TCI funding to expand transit service hours and routes can have a direct impact on reducing GHG emissions. Adding electric buses into the fleet mix can further reduce emissions.
- Implement Region-wide EV Charging Stations. Improvements in electric vehicle technology will result in increases to the number of these zero emission vehicles operating throughout the TCI region. Proactively siting and constructing accessible stations will assist in efforts to accelerate the introduction of clean vehicles to rural areas and provide the necessary fueling infrastructure.

We are encouraged that the TCI initiative will provide funding for a variety of programs to reduce GHG emissions. However, there has been some discussion that the program design would allow some of the funding to be utilized for discretionary programs that would have limited or indirect emission reduction benefit. Including this in the MOU is concerning as it is important that the use of these funds provide a direct emission reduction benefit. Jurisdictions that desire to implement programs which do not have actual GHG emission benefits should seek alternative funding sources for such programs and be prohibited from using TCI funds. Future work on the MOU should also include more specific assurances that rural areas receive their fair share of funding to implement programs that reduce GHG emissions.

BRPC appreciates this opportunity to provide comments on the draft MOU. We are eager to learn more about the specifics of this program and provide additional detailed comments on the final MOU and framework when it becomes available later this year.

Cc:

The Honorable Charles Baker, Governor

The Honorable Adam Hinds, Senator, Berkshire, Hampshire, Franklin & Hampden District

The Honorable John Barrett, Representative, 1st Berkshire District

The Honorable Paul Mark, Representative, 2nd Berkshire District

The Honorable Tricia Farley-Bouvier, Representative, 3rd Berkshire District

The Honorable Smitty Pignatelli, Representative, 4th Berkshire District

Secretary Kathleen Theoharides, Executive Office of Energy and Environmental Affairs

Secretary Stephanie Pollock, MassDOT