




# BRPC

Berkshire Regional Planning Commission

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TO: Transportation and Climate Initiative  
DATE: November 25, 2020  
SUBJECT: Transportation and Climate Initiative Comments  
FROM: Thomas Matuszko, Executive Director 

The Berkshire Regional Planning Commission, BRPC, has been following the development of the Transportation and Climate Initiative (TCI) which seeks to reduce carbon emissions from the transportation sector. A great deal of information has been presented about TCI through on-line webinars and forums; more of the program details remain to be finalized as the process moves forward. BRPC is supportive of the TCI effort but only if it does not shift the burden to residents that are least likely to benefit from it. As we are nearing a point when Governor Baker is expected to make a final decision to sign on to this initiative, BRPC is using this opportunity to share comments so that funding is allocated equitably to regions and then directed to measures that are beneficial to all residents and would be effective at reducing carbon emissions.

Although some of the specific details of the program remain to be finalized, it appears that more information related to this program exists but has not been made widely available. For example, numerous types of modeling have been performed yet the results have not been summarized or publicized. Both the public and elected officials should have access to this information in an easily understandable format. Also, subject matter experts have alluded to some of the Governor's desires related to the use of TCI funds, but the state's website does not contain any information about this. Over the past two years since this effort began, only a few informational meetings have occurred in our region. A significant program such as TCI, which has far reaching impacts, should include more public outreach meetings with information which is specific to the Commonwealth of Massachusetts. Statements made by officials regarding the program should be posted to the state's website on a regular basis.

Berkshire County is predominately rural, and residents must travel further for typical daily activities such as work, school, shopping, and medical appointments. Transit options are very limited in terms of the number of routes and frequency with no service after 7 PM or on Sundays. As such, residents spend more of their income on transportation costs in comparison to residents in urban areas who also have more transit options. Furthermore, income levels in Berkshire County significantly lag other areas of the Commonwealth and rank as the second lowest. Median household income is nearly 27% less than the statewide average. The stated increase in fuel costs to create a revenue source for TCI is an inequitable burden for our residents. This inequity must be addressed.

One area of significant concern in Berkshire County relates to the equitable distribution of TCI revenue. Many Berkshire County residents still object to the fact that 1% of sales taxes collected in Berkshire County goes directly to MBTA for services which our residents do not utilize or benefit from. The TCI program design for Massachusetts must insure, at a minimum, that revenue collected is distributed equitably in relation to where it was collected. Annual reports on the effectiveness of the program should also include a financial component

containing information on the collection and distribution of program funds. We have strong concerns that TCI revenue will be used extensively to benefit and subsidize the MBTA; a service for which most Berkshire County residents receive little benefit from.

Most recently a minimum investment requirement for the use of TCI revenue was proposed that would establish a minimum investment of 35% for underserved and overburdened communities so that those communities would benefit equitably from clean transportation projects. Each jurisdiction would designate an advisory body with diverse representation, including community residents to identify underserved and overburdened communities, provide guidance for investments, and define goals and metrics for measuring progress. If this proposal moves forward it will be extremely important for rural communities to have representation on the advisory body. Residents in rural communities face many of the problems, such as poverty, as residents in non-rural areas but are not typically considered underserved and overburdened. BRPC formally requests that the advisory body include a representative from our organization.

A report commissioned by the Nature Conservancy mentions that electric vehicles and charging stations are a viable measure to reduce carbon emission in rural areas. Given the income disparities between Berkshire County and other areas of the Commonwealth, the rebate or incentive amount to our residents will need to be significantly higher for this measure to have any meaningful impact of reducing emissions. Simply put, residents do not have the financial means to purchase new vehicles, let alone new electric vehicles with an even a higher cost. Increasing the number of electric vehicles in the Berkshires must also be accompanied by the construction of a network of public charging stations at suitable locations with coverage throughout the region. Additional benefits can also be derived from mandating that local public fleets begin transitioning to electric vehicles, which should be funded by TCI revenue. The use of electric vehicles in public fleets can reduce or eliminate apprehension over new vehicle technology.

Increased funding for transit that would increase service hours and support other innovative transportation options appear as viable candidates for TCI revenue. It is our understanding that Governor Baker desires that a sizable portion of TCI revenue be directed towards transit. Expanding transit in Berkshire County has the potential to reduce emissions; however, the funding should be available for a variety of transit vehicle sizes. Also, several agencies including 1Berkshire, BRPC and the Berkshire Regional Transit Authority are currently designing a program to address employment based first/last mile transportation needs. TCI revenue should be directed at these efforts to improve mobility options while simultaneously reducing emissions. TCI revenue provided for transit should only be used for expanding service or establishing new service and by no means should it be used to supplant existing transit funding.

At least initially, the use of TCI revenue should be prioritized towards those items that have a direct nexus to emission reduction, such as electric vehicles, electric vehicle infrastructure buildout and mass transit. The use of TCI revenue for items, such as support for infrastructure in village and town centers, and the installation of broadband in underserved areas, that would have an indirect benefit should be minimized. These items could consume large amounts of revenue and may not yield demonstratable results.

The COVID-19 pandemic has had a significant impact on the economy at both the state and national level. Although there may be an urgency to begin emission reductions from the

transportation sector and mitigate the effects of climate change, the TCI program should not proceed until the economy has fully recovered. This additional cost impact would further worsen the predicament of businesses and families.

The design of the TCI program is such that emission allowances may ratchet down over time. One thing which the pandemic has taught us is to include provisions for the unexpected. The program design must include provisions to suspend the program under exceptional circumstances such as what we are facing with the pandemic. By having such a provision, it will assist helping to address uncertainty and hardship during difficult times. This is a provision that should be included in the MOU.

BRPC appreciates the opportunity to provide comments on the TCI initiative as Governor Baker considers signing on to the MOU. We seek assurances that our region receives a fair share of the revenue, if not greater, to resolve the inequities faced by rural areas and the income disparities that are further exacerbated from the program design and increased fuel cost. We also want to be involved in decision making process as this program design is finalized and formally request that BRPC be provided a seat at the table and be included in the State's TCI advisory body. Consideration of these comments will help to insure that that a program to address emissions from the transportation sector is designed in a manner that is efficient and equitable while taking rural issues into consideration.

These comments were endorsed by the Berkshire Regional Planning Commission at its meeting on November 19, 2020.

cc:

The Honorable Charles Baker, Governor  
The Honorable Adam Hinds, Senator, Berkshire, Hampshire, Franklin & Hampden District  
The Honorable Karen Spilka, Senate President, 2nd Middlesex and Norfolk 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  
The Honorable Robert DeLeo, Speaker of the House, 19th Suffolk District  
Secretary Kathleen Theoharides, Executive Office of Energy and Environmental Affairs  
Secretary Stephanie Pollack, MassDOT  
Geoffrey Beckwith, Massachusetts Municipal Association