



PENNSYLVANIA STATE ASSOCIATION OF TOWNSHIP SUPERVISORS

June 1, 2021

PennDOT Pathways
Pa Department of Transportation
Keystone Building
400 North Street
5th Floor
Harrisburg, PA 17120
PennDOTPathways@pa.gov

To Whom it May Concern:

The Pennsylvania State Association of Township Supervisors represents Pennsylvania's 1,454 townships of the second class and is committed to preserving and strengthening township government and securing greater visibility and involvement for townships in the state and federal regulatory and legislative arenas. Townships of the second class cover 95% of Pennsylvania's land mass and represent more residents — 5.5 million Pennsylvanians — than any other type of political subdivision in the commonwealth. The need for continued, dedicated transportation funding for local roads and bridges is of critical importance to all townships, regardless of road miles or demographics.

Local roads and bridges and state highways, along with air, rail, and the mass transit system, comprise a single transportation network for the commonwealth's traveling public. Pennsylvania has more than 117,000 total road miles, and two-thirds of these, along with thousands of local bridges, are owned and maintained by local government. Specifically, townships alone maintain more than 57,000 miles of road to PennDOT's nearly 40,000. The Association believes that local government is an essential partner with the state in maintaining our roads and bridges.

Below are comments on the draft PennDOT report on Alternative Funding: Planning and Environmental Linkages Study.

How does the Pathways PEL draft intersect with the ongoing work of the Transportation Revenue Options Commission? Will the reports from each be coordinated or are they on purely separate tracts with nearly the same timeframe?

While the report discusses the concept of cost reduction, it does not appear to propose any specific suggestions. We again suggest that costly mandates such as prevailing wage be examined and revised or eliminated to implement cost reductions for projects and encourage local contractors to participate in more state and local road projects. Even increasing the current threshold of \$100,000 for prevailing wage projects would be helpful to municipalities.

Much of the background in this report appears to have been gathered pre-COVID. While COVID impacts are noted, it appears that pandemic impacts are now disappearing. Gas prices are increasing as heavy traffic volume returns. In preparing this report, has PennDOT considered that a post-COVID world may not look like a pre-COVID world? Certain projects may no longer be needed if traffic volume decreases due to long-term work from home or partial work from home concepts. How can we predict post-COVID traffic flows and

volumes? Right now, traffic volume has increased, but could this be pent-up demand? Also, how do increased gas prices figure into these analyses? Most were based on an estimated cost of \$2.50 to \$2.60 per gallon. With increased prices, revenues from the gas tax will also increase. How do these factors impact the findings and recommendations in this report?

With congestion pricing, must diversions be offset by toll revenue, as in bridge tolling? We would maintain that they should. There is no doubt that local roads and bridges will bear the brunt of any diversions.

We appreciate the improvement in detail over the first release, as well as detailed diversion study criteria and diversion mitigation techniques. However, the report continues to be centered on PennDOT's road and bridge needs instead of on the entire transportation system. We would again urge the Department to rethink this approach and bring local needs into the draft and push for predictable, reliable, and dedicated funding sources for the entire transportation system.

Municipalities should receive a fair share of state liquid fuels funds to adequately maintain the local road portion of the entire commonwealth system. PSATS supports the use of a blend of revenue sources, including the oil franchise tax, registration fees, and public-private partnerships to fund the state and local highway and bridge systems. While the Pathways proposal acknowledges the importance of these funding sources, again, it does not recognize the critical importance of funding the local side of this system. Local, safe roads are the foundation of the Commonwealth's transportation network. Few can get anywhere or receive anything absent this first and last mile of infrastructure.

While the Pathways proposal includes a list of fee and tax increases as options, it is vague and does not recommend any specific options. In fact, it seems light on analysis of the funding options. We cannot truly evaluate these options without detailed proposals including the taxes and fees recommended, how they will be used, and what share, if any, local government will receive. If local government is not considered for part of any new funding, we will need to object to it.

In closing, **we urge PennDOT to view local government as a partner in the delivery of services to our mutual residents** and to focus efforts on creating a package of funding solutions and measures that will reduce the cost of providing transportation infrastructure. We look forward to continued discussions with the Department on how to include local government in this proposal to ensure that our citizens and businesses will have a safe and fully funded transportation system for decades to come.

Sincerely,



Joseph Gerdes III,
Director of Government Relations