

## **Comment Letter in Response to Regional TCI Documents Released June 10, 2021**

### **To:**

#### **TCI Leadership Team:**

- Kathleen Theoharides, Secretary, Massachusetts Executive Office of Energy and Environmental Affairs and R. Earl Lewis, Jr., Deputy Secretary, Maryland Department of Transportation

#### **TCI Executive Policy Committee:**

- Marty Suuberg, Commissioner, Massachusetts Department of Environmental Protection and Roger Cohen, Senior Advisor to the Secretary, Pennsylvania Department of Transportation

#### **TCI Technical Analysis Workgroup:**

- Christine Kirby, Assistant Commissioner, Massachusetts Department of Environmental Protection and Chris Hoagland, Economist, Climate Change Division, Maryland Department of the Environment

#### **TCI Investment and Equity Workgroup:**

- Garrett Eucalitto, Deputy Commissioner, Connecticut Department of Transportation, Kate Fichter, Assistant Secretary, Massachusetts Department of Transportation, Kirsten Rigney, Legal Director, Connecticut Department of Energy and Environmental Protection and Dan Sieger, Undersecretary of Environmental Affairs, Massachusetts Executive Office of Energy and Environmental Affairs

#### **TCI Outreach and Communications Workgroup:**

- Chris Bast, Chief Deputy, Virginia Department of Environmental Quality and Elle O'Casey, Director of Communications and Outreach, Vermont Agency of Natural Resources

#### **Governors, Mayors, and Other Officials:**

- Connecticut, Delaware, District of Columbia, New Jersey, New York, North Carolina, Maryland, Massachusetts, Pennsylvania, Rhode Island, Vermont, Virginia

## Summary of Top Recommendations

### [Feedback on Model Implementation Plan](#)

- Describe how jurisdictions will increase the independence of the Equity Advisory Body (EAB) appointment process and detail the specific types of EAB capacity support and accessibility measures each jurisdiction will pursue.
- Outline community engagement activities and in-depth plans for each phase of TCI implementation from implementation plan development to program review.
- Clearly identify timelines and actions to expand air quality monitoring and lift up community leadership and capacity through implementation. Describe concrete steps to improve TCI-P according to air quality monitoring data and guarantee localized emission reductions.
- Explicitly name the labor conditions that will inform RFP funding prioritization and describe plans to support workers and facilities impacted by the transition to cleaner transportation.
- Share proposed steps to regulate the secondary market through purchase and holding limits.
- Spell out the timeline and plans for codifying “additional policies.”

### [Feedback on Strategies For Regional Collaboration](#)

- We support the development of community based air quality monitoring approaches and urge jurisdictions to take timely action to expand monitoring in “overburdened and underserved” communities and ensure local, real time data is shared in a publicly accessible way.
- Prioritize projects where employers commit to union neutrality or have collective bargaining contracts or a Project Labor Agreement in place, restrict investing in projects that contract with temporary staffing agencies, and require TCI-P affiliated companies to commit to no mandatory arbitration.
- We encourage jurisdictions to expand fare free transit, fund transit at equal if not higher levels than highways, and increase deployment of zero emission transit buses with a priority toward “underserved and overburdened” areas.
- TCI-P jurisdictions should begin developing, in consultation with local and regional organizations, their own comprehensive state strategies to address pollution from trucks and buses through regulatory proceedings (like the Advanced Clean Trucks and Heavy Duty Omnibus rules) and legislation and programs to drive equitable fleet electrification and charging infrastructure deployment.
- Clarify plans for deploying medium and heavy duty charging infrastructure, consult EABs and communities in proximity to busy interstate highways on placement, and prioritize deployment based on air quality monitoring data.

### [Feedback on Framework for Public Engagement](#)

- Work directly with and support community based organizations who represent communities whose voices have not been heard yet to facilitate education and outreach and ensure strong union representation in TCI discussions.

- Build trust with partners by sharing draft enabling legislation transparently and provide technical support and resources to grassroots organizations to amplify their community organizing efforts.
- Employ a train-the-trainer model to advance TCI-P engagement and cultivate a list of trusted channels through which jurisdictions will actively publicize TCI-P.

August 20, 2021

Dear TCI decision-makers,

We write as social justice, transit justice, racial justice, and environmental groups in response to the documents you released on June 10, 2021 including the Model Implementation Plan, the Strategies for Regional Collaboration, and the Draft Framework for Public Engagement. We appreciate how the Model Implementation Plan (MIP) and Draft Framework for Public Engagement begin to reflect the “Equity Advisory Body Principles” we submitted earlier this spring by placing emphasis on a more accessible and inclusive decision-making process. We also support the increased attention to labor standards and community based air quality monitoring in both the MIP and Strategies for Regional Collaboration.

Given that these proposals were not included in the model rule itself, they are just the first step to ensure the Transportation and Climate Initiative Program (TCI-P) can fulfill its promise to reduce pollution and increase access to jobs and economic benefit for disproportionately impacted communities. Whether this actually occurs will depend on *how* individual TCI-P jurisdictions carry out their implementation plans and other policies outlined in the Strategies for Regional Collaboration document. Greater specificity and intentionality is required in both of these documents to help communities understand how TCI-P jurisdictions will make meaningful headway on equity. Below are our in-depth recommendations to finetune these documents and set a higher and more robust regional standard for TCI-P jurisdictions adopting clean transportation policies.

### **Feedback on [Model Implementation Plan](#)**

We commend TCI jurisdictions for creating the draft Model Implementation Plan (MIP) to help ensure that TCI-P is adopted in a way that meets the equity, labor, and other priorities of the program. The MIP should direct each jurisdiction to update its implementation plan annually as informed by the Equity Advisory Body. The plan should be updated in ways that strengthen implementation without rolling back existing commitments in order to more meaningfully achieve the goals of TCI-P. There is room to make the MIP even more specific to ensure each jurisdiction’s own implementation plan is comprehensive and impactful. Below are detailed areas of feedback to ensure the MIP is a robust template for all jurisdictions adopting the policy.

#### **1. Introduction and Program Goals**

As currently written, this section allows jurisdictions to reiterate regional TCI-P goals. However, this section of the MIP can specify how the common TCI-P goals square with each

jurisdiction's unique needs, context, and priorities and whether there are additional goals or points of emphasis that build upon the regional program goals.

## 2. Establish or Designate Equity Advisory Body

We strongly support the three primary areas of emphasis that the MIP outlines to establish the equity advisory body. These building blocks are in close alignment with the [Equity Advisory Body Principles](#) submitted April 6, 2021 by transit justice, racial justice, social justice, labor, and environmental groups across the region. However, the MIP should offer greater detail to guide jurisdictions in crafting their EAB plans.

First, the MIP should explicitly encourage TCI-P jurisdictions not just to “describe the parameters for determining the membership of the EAB,” but also to mention *how* they will do so in order to increase the independence of the appointment process. That way, jurisdictions can explicitly detail how they aim to uplift community voices in setting up this crucial body and reduce the influence of political bias from changing administrations over appointments. If a jurisdiction selects an existing EAB to serve in this capacity, the implementation plan should describe why they chose that body and why it is well suited to represent the concerns of “overburdened and underserved” communities.

As for the roles, responsibilities, and capacity support section, all jurisdictions should list out the exact kind of training, technical support, and financial compensation or reimbursement they plan to provide EAB members to facilitate their success. In the case that EAB responsibilities involve offering recommendations, the MIP should specify how each jurisdiction will be accountable to those recommendations and conduct transparent decision-making (for instance, through submitting written reports that detail how decisions incorporate EAB feedback). A line should be added that encourages each jurisdiction to build upon the EAB responsibilities listed in the model rule in a way that ensures EABs have significant agency. Amongst other responsibilities, jurisdictions should give EAB members the role of developing proposal evaluation, scoring, and prioritization criteria to assess the various fund allocation proposals.

The MIP should clarify in the EAB accessibility and transparency section the specific types of accessibility they will address. At a minimum, this should include their plan to increase language accessibility, accessibility for people with disabilities, accessibility across education levels, accessibility of meetings for working families, accessibility for those without access to reliable means of transportation, and accessibility for those who lack access to wifi or reliable broadband. Furthermore, it is too vague to say that EAB development will occur early. Specific dates should be included in this section to allow advocates, community based organizations, and community members to plan accordingly.

## 3. Defining “Underserved and Overburdened Communities” For the Purposes of the Program

The directive in the MIP regarding defining “underserved and overburdened” lacks specificity as currently written. The MIP should break this down into subsections like the EAB section above to include clear timelines, tools (mapping etc.), research, and public engagement

processes needed to arrive at the definition. We encourage you to actively research how TCI-P jurisdictions and other states outside the region have approached defining “overburdened and underserved” communities. However, the Equity Advisory Body for each jurisdiction should be the ultimate body in charge of shaping an exact definition through a publicly accessible process.

#### 4. Working With Stakeholders to Develop a Public Engagement Plan

Once again, this section could benefit from significantly greater detail. Each phase of the program should be listed as a subsection header starting with the engagement process to influence development of the implementation plan itself. Other critical phases that should be identified at a minimum are: the public process to recruit members to serve on the EAB, actual decision-making of the EAB itself, defining “underserved and overburdened,” informing air quality monitoring expansion, investment allocation, and program review. The MIP should be explicit about directing TCI-P jurisdictions to outline which communities they will make a concentrated effort to engage as part of their outreach and the common types of outreach activities that each jurisdiction should plan for at a minimum, such as: social and digital media, radio, print media, and in-person community events and workshops. It is especially critical that TCI-P jurisdictions broaden and deepen the scope of the most responsive public engagement processes, including grassroots community organizing efforts, related to advancing more equitable and just clean transportation options.

The MIP should require jurisdictions to list out which steps they will take to make the public engagement process as accessible as possible (this should extend not just to the EAB process as mentioned in Section 2 but also other critical phases of engagement). The MIP should prompt jurisdictions to list when and where to find information about relevant hearings, materials, and decisions online and what kinds of training they will offer to help community members understand TCI-P, how it affects their lives, and how to engage. Lastly, each jurisdiction should proactively list out which community based organizations, unions, and other key stakeholders they either already have or will plan to engage as part of the implementation process.

#### 6. Ensuring Transparency and Accountability Regarding TCI-P Implementation and Progress Toward Achieving Program Goals

Instead of directing jurisdictions to outline generally the steps they plan to take to implement the model rule commitment around air quality monitoring and reporting, the MIP should specify subsections each jurisdiction will fill out as part of this process. This includes the process they will use to inform placement of additional air quality monitors (outside of seeking recommendations from the EAB). The MIP should prompt jurisdictions to spell out their timeline for identifying new sites for air quality monitor placement, actually installing those monitors, establishing an air quality baseline before the first auction of allowances, and reporting. Another subsection that the MIP should include is how each jurisdiction will engage directly with and support the leadership of disproportionately impacted communities in carrying out the air quality monitoring process. This step is crucial because air quality monitoring efforts provide an opportunity for residents most impacted by poor air quality to access the data and tools needed

to improve their conditions. These communities should receive the training and resources needed to actively lead air quality monitoring efforts in their own neighborhoods and produce data, in partnership with TCI-P jurisdictions, that will inform localized pollution reduction measures and TCI-P implementation.

Air quality monitoring is an important accountability and data gathering step to measure whether TCI-P is achieving progress toward program goals but is only a first step. Jurisdictions should describe how air quality monitoring results will lead to concrete improvements in the TCI-P program itself. For instance, if air quality improvements in the most heavily polluted neighborhoods fail to materialize, one way to address this through program adjustments is to direct the EAB to recommend increases in the percentage of dedicated proceeds prioritized for “overburdened and underserved” communities. Jurisdictions should also actively list the actions they plan to take through regulation or legislation to reduce air pollution in neighborhoods with the highest pollution, as identified via the air quality monitoring data, separate from the TCI-P context.

A model example for how jurisdictions can meaningfully address pollution hotspots is the Massachusetts bill *An Act to Improve Outdoor and Indoor Air Quality For Communities Burdened by Transportation Pollution* ([H2230](#) / [S1447](#)). The bill would establish a technical advisory committee to advise on air quality monitor placement, expand outdoor air quality monitoring for black carbon, ultrafine particulate matter, and criteria pollutants, and set enforceable air quality targets by 2030 and 2035. TCI jurisdictions should also consider implementing community led processes (like California’s [Community Air Protection Program](#)) to follow the lead of overburdened communities when identifying appropriate pollution reduction measures.

## 7. Investing Proceeds and Creating High-Quality Jobs Through Transparent Processes

We appreciate the additional detail from this section that prompts jurisdictions to spell out project selection criteria for RFPs and workforce development program plans. We first recommend that the MIP explicitly offer a definition for “high quality” jobs. We also recommend the following adjustments. Under the subheading “level of proceeds invested for the benefit of OAU communities,” the word “minimum” should be added before level.

In the Draft Proposed Strategies for Regional Collaboration, specific recommendations are outlined for TCI project selection criteria to enable TCI projects to achieve high quality jobs goals. We request that the Project Selection Criteria subsection should list out the *types* of preferred labor conditions and recommend the language be changed to:

[Jurisdiction] will describe here the policy and programmatic decision-making processes through which projects will be selected for funding, including any conditions to ensure high-quality domestic jobs, such as projects that have prevailing wage requirements, union neutrality, Fair Chance hiring policies, ample domestic sourcing for component parts, and employers with a current community benefit agreement, collective bargaining agreement, or project labor agreement in place.

In addition, the MIP should include criteria for selecting workforce development programs and encourage jurisdictions to describe their plans to preserve jobs and retool workers and facilities who may be impacted by the transition to a cleaner transportation system.

#### 8. Collaborating With Other TCI-P Jurisdictions to Administer TCI-P

In order to prevent collusion, market power and/or price manipulation we recommend that the TCI-P jurisdictions should, in addition to the market monitor, outline in this section the steps they plan to take to regulate the secondary market through purchase limits on the percentage of allowances fuel distributors can hold and, during a future program review, regulate holding limits on the time period they can hold them.

#### 9. Advancing Additional Policies to Help Achieve the Goals of TCI-P

We appreciate the inclusion of this section to ensure that TCI-P jurisdictions take a more holistic approach to advancing a cleaner transportation future. In addition to describing the policies they plan to pursue, the MIP should prompt jurisdictions to list how they plan to pursue and codify them (through regulatory, legislative, or other pathways) along with a timeline for action. Additionally, each jurisdiction should list the entities and specific representatives (along with contact information) responsible for shepherding and implementing these policies.

### **Feedback on [Strategies for Collaboration](#)**

We commend TCI-P jurisdictions for creating the Draft Proposed Strategies for Regional Collaboration to help ensure that TCI-P is adopted in a way that achieves the goals of the program and better outcomes for our communities, businesses, and workers. Further details are needed regarding the specific steps states will take to collaborate on these issues, the progress each state intends to make within their own jurisdiction to advance these goals, the timeline for regional collaboration and each jurisdiction making measurable progress, and the ways in which stakeholders and the public can be informed and engaged along the way.

The comments below detail additional feedback that could improve this outline of strategies.

#### 1. Air Quality Monitoring in Communities Overburdened by Air Pollution to Ensure Transparency Regarding the Effectiveness of Emissions Reduction Policies

One of the major purposes of TCI-P is to improve air quality and health equity. Therefore, we appreciate the commitment to develop community based air quality monitoring approaches and include air quality monitoring as an evaluation criteria to determine if the rule is meeting its purpose. In order to strengthen this section we recommend the following changes.

In addition to recommending a process for identifying air quality monitoring approaches, equally needed are recommendations for participating jurisdictions to identify action steps to ensure implementation of expanded air quality monitoring programs and that data is short term, local, publicly accessible, real time, and ground level. TCI-P jurisdictions should meaningfully *increase* air quality monitoring efforts beyond existing monitoring related to compliance with the federal Clean Air Act and focus this expanded monitoring on tracking air quality in “overburdened and underserved” communities.

Included below in italics are recommendations to the second paragraph.

TCI-P jurisdictions will work with communities and organizations in the region, particularly those communities overburdened by air pollution, to develop community-based air quality monitoring approaches. This will include sharing best practices, discussing new monitoring technologies and equipment, reviewing data, *and identifying action steps and a timeline to expand the implementation of air monitoring programs*. Each jurisdiction will work with technical experts and communities to inform air quality monitoring programs *to evaluate the success of the TCI program in a publicly accessible way*.

As for the questions that TCI-P jurisdictions are seeking input on to inform air quality monitoring strategies, we share the following initial responses. First and foremost, all air quality monitoring implementation should be guided, informed, and led by communities most impacted by poor air quality. TCI-P jurisdictions should prioritize placing additional air quality monitors in areas near busy highways, ports, and distribution centers. At a minimum, monitors should track PM10, PM2.5, NOx, ozone, and VOC levels. We also recommend that air quality monitoring data be shared with community members in real time via a publicly accessible digital dashboard.

## 2. Ensuring High-Quality Domestic Jobs and Workforce Development

We appreciate how TCI-P jurisdictions have incorporated recommendations to improve the possibility that TCI projects will create high quality jobs and economic opportunity. We strongly urge TCI-P jurisdictions to strengthen the language through the following edits:

- Low-carbon transportation investments funded by TCI-P program proceeds will ~~aim to~~ prioritize projects that ~~are subject to prevailing wage rules~~ *meet prevailing wage requirements*.
- Low-carbon transportation investments funded by TCI-P program proceeds will ~~aim to~~ source a high percentage of components *and/or materials* from US-based manufacturers.
- Low-carbon transportation investments funded by TCI-P program proceeds, where applicable, will ~~aim to provide~~ partner with ongoing *state recognized workforce development programs and union apprenticeship programs* that create economic opportunities for people of color and low-income communities.
- Low-carbon transportation investments funded by TCI-P program proceeds will ~~aim to~~ prioritize employers with “Ban the Box” or “Fair Chance” hiring policies in place, to help enable previously incarcerated job applicants to make it past the first screen of hiring processes.

The “Strategies for Regional Collaboration” document asserts that TCI-P jurisdictions “recognize unionization as an important strategy.” In order to follow through on this assertion, TCI-P jurisdictions must support organized labor, unionization, and the rights of workers to



organize themselves through the following means: 1) Prioritize projects where employers commit to union neutrality in industries connected with TCI-P investments and 2) Prioritize TCI-P projects that involve employers with collective bargaining contracts or a Project Labor Agreement in place. Both of these strategies have been left out of the recommendations in this document. We strongly urge them to be included. Additional recommendations include the following:

TCI-P funding should restrict investing in projects that contract with temporary staffing agencies (unless agencies certify that temporary employees are necessary to address an acute, short-term labor demand). Temporary employees, with the same skills and experience, earn an average of 22% less pay for the same work and usually receive no benefits of any kind. Additionally, in some industries, 9 out of 10 workers report incidence of wage theft and no ability to recover what they are owed.<sup>1</sup>

Companies or institutions connected to TCI-P funding should commit to no mandatory arbitration. Mandatory arbitration is a controversial practice in which a business requires employees to agree to arbitrate legal disputes with the business rather than going to court. It occurs when an employer conditions initial employment, continued employment, or important employment benefits on the employee's agreement to arbitrate any future claims against the employer. Mandatory arbitration deprives workers of the right to access the public court system.<sup>2</sup> The practice results in workers finding it exponentially more difficult to enforce their rights going forward.

### 3. Investing in Transit to Ensure Safe, Reliable and Equitable Service

We acknowledge that TCI-P jurisdictions are committed to providing safe, reliable and equitable transit service for communities and agree that robust and affordable transit systems are critical for providing people with access to jobs, healthcare, and education. Investments from TCI-P funds should not replace budget holes but rather build upon existing programs and state transit funding. Using both state and federal dollars, TCI-P jurisdictions should prioritize expanding transit access, ensuring that transit is funded at the same if not higher levels than highways, and providing fare relief for all, especially low income riders.

We propose the following additions to this section in order to put forth specific recommendations for TCI-P participating jurisdictions:

- Clarify that investments should go toward improving operations and increasing the frequency, reliability, and affordability of transit service in addition to capital investments.
- Clarify that funds should prioritize programs that make transit affordable or free for everyone, prioritizing people with low incomes, people with disabilities, seniors, students, and youth.
- Funds should prioritize maintenance and utilitarian upgrades of existing transit infrastructure above aesthetically-driven projects or high-cost capital expansions.
- In addition to an increase in reliable, frequent, and affordable service, TCI-P jurisdictions should increase the purchase of zero emission transit buses and associated charging

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<sup>1</sup> National Employment Law Project and National Staffing Workers Alliance. Rebecca Smith and Claire McKenna. Tempted Out: How the Domestic Outsourcing of Blue Collar Jobs Harms America's Workers.

<sup>2</sup> Economic Policy Institute. The Growing Use of Mandatory Arbitration. Alexander J.S. Colvin. September 27, 2017.

infrastructure with priority deployment in “underserved and overburdened” neighborhoods.

- Dedicated investment should also focus on improving sidewalk infrastructure, last mile connections through sidewalks or bike lanes connected to transit and critical amenities, and micro-mobility including e-scooters, bike sharing networks, and e-bikes.
  - TCI-P jurisdictions should directly consult transit workers and riders to guide their implementation of these recommendations.
4. Coordinating Public Engagement and Implementation Plans to Replace Diesel Trucks and Buses with Zero-Emission Vehicles

We support TCI-P jurisdictions collaborating on and sharing best practices around public engagement to inform the implementation of the MHD MOU coordinated through NESCAUM. This public engagement should be addressed in tandem with TCI-P outreach rather than separately. However, in addition to outreach, jurisdictions should use this in-depth stakeholder process to begin creating their own comprehensive strategies and plans to advance zero emission trucks and buses without waiting for the MHD Action Plan to come out. TCI-P jurisdictions can begin mapping out clear strategies and policies they intend to research, and with the support of local and regional organizations, begin adopting to drive this transition. This may include initiating regulatory proceedings or attaining legislative authority to adopt sales mandates like the Advanced Clean Trucks rule and the complementary Heavy Duty Omnibus rule. This may also include bold plans to achieve commitments around equitable fleet electrification (including public transit, school bus, and other large municipal fleets) and charging infrastructure deployment with a priority toward neighborhoods with the greatest pollution burden. By moving on these in-state processes now, as informed by community engagement, TCI-P jurisdictions can set a model for jurisdictions across the region and begin tackling the most heavily polluting vehicles on the road.

#### 5. Equitable Electric Vehicle Corridor Planning

Regional electric vehicle corridor planning is an important way to coordinate and streamline the transition to a cleaner transportation system across the region. Significantly expanding charging infrastructure can increase confidence for individual consumers and businesses alike to adopt zero emission vehicles. This section should make clear how TCI-P jurisdictions are planning for not just light duty but also medium and heavy duty charging infrastructure. The inventory of fast charging stations should be made publicly available with an easy to use interface or map. New locations for installing EV charging infrastructure should be identified in consultation with EABs and communities who live near the busiest interstate highways. At a minimum, areas deemed to have the highest levels of pollution from air quality monitoring data should be prioritized for initial deployment of charging infrastructure.

### **Feedback on [Framework for Public Engagement](#)**

We welcome the release of the Framework of Public Engagement document which is well intentioned and proposes some solid guidelines. Below are our additional recommendations to strengthen this document.

*Is anything missing from this proposed public engagement approach that is important to you?*

- Under #1: It is particularly important to us to have clear union representation, including those representing transit workers. Organizations representing low-mobility individuals should also be a top priority for outreach. The term “meaningful” could be further qualified. There should be regular attempts to engage with potential stakeholders who have not yet been part of the conversation on TCI.
- Under #2: Build trust by making sure communities have access to draft enabling legislation text and are kept frequently updated. Dashboards, communication, and reports should be multilingual and advertised in local media, including community websites, radios, and other channels.
- Under #3: Many potential stakeholders most likely do not imagine themselves as stakeholders in the TCI-P process. There should be an effort to identify and engage with communities whose voices have not been heard yet. Partners beyond traditional low-carbon transportation advocates should be recruited. This includes climate and environmental justice advocates, transit users and workers, faith communities, youth advocacy groups, utility justice advocates, racial justice groups, and more.
- Under #4: Although recording and actively responding to community input is important, true “recognition” of community knowledge and expertise involves actively following and acting upon this feedback in the design and implementation of relevant regulation and legislation as well as allocation of program investments.
- Under #5: Make sure diverse geographic regions are included (rural, urban). We also urge you to work directly with and support community based organizations to facilitate education and outreach (i.e. meet people where they are at) and boost the voices of their membership. It is essential that TCI-P jurisdictions address any technology accessibility issues. All events should be streamed and recorded with recordings shared widely.
- Under #6: There needs to be more specificity on the meaning of capacity. This may include building community capacity through air quality monitoring where community members lead implementation and design, robust compensation for participation, and creating a dedicated fund for community leaders and organizations to lead outreach in partnership with agencies. Agencies, funders, and other organizations not based at the community level should provide technical support and resources to grassroots organizations to build upon their community organizing efforts.

*What is most relevant?*

All of these sections are important but we would highlight in particular #5 (public engagement accessibility) and #6 (long term capacity building). Overall, strengthening and widening community engagement on TCI-P is crucial. The most important element is to make sure communities have an active voice in decision-making processes. This means giving community members leadership roles and sustainable capacity support and that their input is listened to, sought after, and meaningfully incorporated.

*Additional opportunities for engagement?*

There is a clear need to develop a list of relevant information channels and media sources for TCI-P constituents, especially “overburdened and underserved” communities and publicize actively through these channels (i.e. language newspapers, Facebook groups, radio channels, etc.).

*Anything that needs to be added to target benefits?*

We recommend that you employ a train the trainer model that uplifts the role of trusted messengers in sharing information about TCI-P with a broader community. We also recommend going beyond the obvious environmental and transportation organizations to conduct targeted outreach.

In conclusion, the Model Implementation Plan, Strategies For Regional Collaboration, and Draft Framework for Public Engagement offer a starting place to intentionally shape TCI-P implementation so that the potential benefits reach communities who need it the most. We reiterate the importance of incorporating greater detail and action steps into these plans to ensure commitments around air quality monitoring, pollution reduction, labor, community engagement, and more translate into tangible action. We are grateful for the opportunity to share our perspective and are available as needed for any points of clarification.

Sincerely,

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