
Memorandum

To: Transportation and Climate Initiative Leadership Team

From: Metropolitan Area Planning Council, Delaware Valley Regional Planning Commission

On: November 15, 2019

Re: Comments Regarding the Transportation and Climate Initiative Draft Regional Policy Framework

The Transportation and Climate Initiative (TCI) has the potential to be a key component of a comprehensive strategy to address the social, economic, and environmental toll rising greenhouse gas (GHG) emissions place on our communities. Over the past several months, we have convened regional planning agencies¹ from throughout the TCI states and the District of Columbia to discuss the importance of an equitable and robust TCI policy framework, and we are enthused to see the policy development process move forward in a timely and inclusive manner.

Regional planning entities are uniquely poised to play a valuable role in advancing TCI. One of our core functions is to convene local and regional stakeholders on critical land use, transportation, and climate issues facing our communities today and in the future. We often provide direct technical assistance to cities and towns to address these challenges, and in many cases this work happens in collaboration with our state partners. Several regional planning entities are also the authorities designated as MPOs to program federal transportation dollars. As a result of all of these functions, we have deep knowledge and expertise around regional and state transportation and climate needs.

Our organizations commend the progress the TCI leadership team has made in advancing this regional policy proposal. As the TCI jurisdictions build upon the draft regional policy framework released on October 1, 2019 and prepare the draft Memorandum of Understanding, we encourage the leadership team to consider the following principles that our organizations see as crucial to the successful implementation of a cap-and-invest program:

Program Fundamentals

The TCI policy adopted by participating jurisdictions should promote a bold yet achievable cap on transportation emissions.

The regional cap-and-invest policy ultimately adopted by TCI jurisdictions has the potential to make a significant impact on reducing GHG from the transportation sector. It also has the potential to serve as a model to other parts of the country, and to the federal government. A strong cap will not only help TCI jurisdictions to achieve a demonstrable reduction in transportation emissions, but also generate additional revenue needed to encourage use of low-carbon travel options, as well as reduce emissions across all modes. A key component to the success of this regulatory framework will be a strong cap on transportation emissions and maintaining a bold emissions reduction goal throughout the duration of the program.

¹ These agencies include Councils of Governments (COGs), Metropolitan Planning Organizations (MPOs), Regional Planning Commissions (RPCs), and Regional Planning Agencies (RPAs).

TCl investments should lead to significant, measurable reductions in transportation emissions as well as improve transportation options in Environmental Justice (EJ) and low-income rural communities.

To maximize the impact of the funds generated from a cap-and-invest strategy and to build support for the program, revenue should be allocated toward investments that will yield significant and measurable reductions in transportation emissions. TCl jurisdictions should adopt a common set of performance standards for evaluating investment decisions over the short and long term, with specific ways to integrate what is learned into future investment decisions. They should also work toward the shared goal of growing the low-carbon travel mode share in the region.

At the same time, we must acknowledge that residents in EJ and low-income rural communities have too long faced chronic disinvestment in safe and affordable transportation infrastructure, and in many cases a disproportionate impact of the pollution associated with transportation. TCl offers an opportunity to redress these legitimate grievances by targeting significant investments to improve transportation options in these communities – investments that should be accompanied by the adoption of complementary policies designed to improve public health outcomes and to promote economic opportunity.

Collaboration with Regional Planning Entities

Regional planning entities should be active partners throughout the development and implementation of TCl.

Coordination and alignment with the existing modeling work of regional agencies will help to ensure apples-to-apples comparisons of emissions reductions across participating jurisdictions. This is crucial to leverage and complement the existing federal and state dollars MPOs currently program. In addition to these technical capabilities, one primary function of regional planning entities is to convene our municipal and regional stakeholders. The TCl jurisdictions should look to COGs and MPOs as facilitators for conversations around TCl, especially when looking to advance this initiative among local elected officials.

Additional Key Program Features

TCl jurisdictions should consider a combination of capital, operational, and programmatic investments.

TCl investments in both capital and operational programs (e.g., investments in electric buses and reducing bus headways) will provide immediate and measurable emissions reductions, direct significant benefits to EJ and low-income rural communities, and generate support from counties and municipalities. Additionally, by investing in competitive grant programs, the participating jurisdictions can help to ensure that projects with the best impacts per dollar spent are funded, especially if some competitive grant programs are available across all of the jurisdictions. All such investment options should be on the table when considering how this program can most effectively make transformative changes to our transportation system.

TCl revenue must be generated and invested transparently.

Information about the amount of revenue generated, the investments made, and the anticipated emissions reductions should be publicly available online and in physical locations. Any performance measures or emissions targets developed as part of this program should also be made available, along with regular reports highlighting progress on emission reduction goals. While the draft framework references a commitment to meaningful community engagement, the TCl jurisdictions should specifically continue community listening sessions throughout program implementation to gather additional feedback for ongoing investment decisions.

TCI jurisdictions should ensure the possibility for multi-state investments.

Some regional planning entities serve communities located in two states, and know well the challenges associated with inter-state collaboration. While the draft framework reasonably notes that each jurisdiction will make its own decisions about how proceeds are to be invested, there should be the opportunity to make multi-state investments. If multiple jurisdictions want to come together to invest in electric charging stations for I-95 or Amtrak improvements, for example, any regulatory questions regarding how TCI funds may be disbursed across multiple jurisdictions should be answered once the dollars become available.

Thank you for your consideration of these principles, and we look forward to working with you to advance this important initiative.