



## SMART GROWTH AND REGIONAL COLLABORATION

February 28, 2020

Secretary Stephanie Pollack  
Massachusetts Department of Transportation  
10 Park Plaza, Suite 4160  
Boston, MA 02116

Secretary Kathleen A. Theoharides  
Massachusetts Executive Office of Energy and  
Environmental Affairs  
100 Cambridge St., Suite 900,  
Boston, MA 02114

Dear Secretary Pollack and Secretary Theoharides:

The Metropolitan Area Planning Council (MAPC) commends the Baker Administration's leadership to advance the Transportation and Climate Initiative (TCI) among Northeast and Mid-Atlantic jurisdictions. We were pleased when the TCI Leadership team reached the important milestone of releasing a draft Memorandum of Understanding (MOU), and we appreciate the opportunity to provide comments on this MOU, included in this letter.

Climate change does not stop at jurisdictional boundaries, and we will not be able to achieve our emissions reduction goals without regional collaboration. Our organizations are deeply committed to working with our cities and towns to reduce greenhouse gas emissions, expand mobility options, and make it easier to travel without a personal vehicle. We believe a robust and equitable TCI program design can play an important role in achieving all of these objectives.

Regional planning agencies (RPAs) serve as important convening places for cities and towns working to tackle regional transportation issues. Many of our agencies not only program federal and state transportation dollars, but also provide technical assistance to cities and towns working to make important transportation, climate, and land use planning decisions. Many of the communities we work with have existing climate and mobility goals. Within MAPC's region alone, 33 communities have established a greenhouse gas reduction goal, and 17 have a goal that commits to net zero or carbon neutrality. TCI investments will help leverage the ongoing planning and policy work happening in municipalities across the Commonwealth.

### Specific Comments on the MOU

On the issue of setting and adjusting the emissions cap over time, we strongly support the Administration's commitment to achieve economy-wide net-zero emissions in the Commonwealth by 2050. A strong TCI program will only help to achieve this goal if it is part of a much broader strategy. When considering the cornerstone features of the TCI program design, we urge the Administration to advocate for the strongest emissions reductions target—25% reduction in transportation emissions by 2032. While the program design should be flexible enough to accommodate additional jurisdictions that may join TCI after the initial cohort signs on, we encourage the Administration to advocate for a strong cap on emissions at the outset, and for the cap to decline at a reasonably fast pace over time. In addition to addressing the urgent the climate crisis, a rapid and steady decline in allowed emissions will ensure a consistent and significant stream of revenue for the participating jurisdictions, which can be reinvested in low-carbon transportation



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solutions. A bold initial emissions cap and a commitment to steadily decrease the cap over time is crucial to reaching our broader climate goals.

We also believe the items discussed in the clause regarding equitable investments will be crucial to the success of the program in Massachusetts and in the TCI region as a whole. A successful TCI program design and investment portfolio must consider social, geographic, and regional equity. While TCI investments should yield significant and demonstrable reductions in transportation emissions, we must acknowledge that residents in Environmental Justice (EJ), low-income, and/or rural communities have often faced chronic disinvestment in safe and affordable transportation infrastructure, and in many cases a disproportionate impact from the pollution associated with transportation.

Looking ahead to the time when TCI is implemented here in Massachusetts, we strongly encourage the Administration to adopt a framework for evaluating the social, economic, and environmental impacts of different TCI investment portfolios on vulnerable populations. We recommend such a framework build upon the Massachusetts Department of Environmental Protection's existing definition of EJ communities and include a number of other elements to ascertain what communities may face undue exposure to transportation and environmental burdens, including: population exposure to pollution from various sources, access (or lack of access) to public transit, asthma rates, and a number of other factors.<sup>1</sup> It would be reasonable to adopt guidance that a certain percentage of TCI-funded projects and/or dollars be directed to address the needs of these populations, similar to the way in which the MassWorks program uses a portfolio standard to ensure that a significant portion of investments are located in transit-oriented development (TOD) communities.

At the same time, we urge you to allow for a reasonable amount of flexibility when determining how TCI revenue may be spent. The best solutions for reducing transportation emissions in our transit-dense urban centers will look different than what is most suitable for the more auto-oriented suburban and rural regions of the Commonwealth. While investments in public transit, advancing fleet electrification, and expanding our electric vehicle charging network are all noteworthy strategies to pursue, we encourage the Administration also to consider using revenue to expand the production of affordable housing near transit and other creative and innovative solutions for reducing vehicle use and thereby reducing transportation emissions.

Land use and transportation planning are inextricably linked, and we feel strongly that patterns of settlement that allow people to reduce the frequency and duration of single-occupancy vehicle trips are an integral component of a broader strategy to reduce emissions from transportation. The preamble of the MOU, which highlights the overarching vision and values for this program, should make clear the importance of smart growth and Equitable TOD to achieving our carbon reduction goals. Specifically, we suggest adding to the list of "clean transportation strategies" in the last "whereas" clause of the MOU, the words "encouraging the location of housing and jobs closer to transit to reduce the frequency and duration of automotive trips."

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<sup>1</sup> The [CalEnviroScreen Tool](#), which identifies California communities by Census Tracts that are disproportionately burdened by, and vulnerable to, multiple sources of pollution, is used to identify targeted communities for investment under California's economy-wide cap and trade program. This tool can be very helpful to inform a framework for evaluating the impact of TCI investments in the Commonwealth and the TCI region as a whole.



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In regard to the Appendix to the MOU, MAPC has the following suggestions:

Amend the second sentence in Section 3.A., to read: “Participating jurisdictions may identify shared or common priorities for investment of proceeds, including **cross-jurisdictional projects and investments**, to maximize the efficiency of the regional program and to ensure greater benefits, and to achieve CO<sub>2</sub> emission reductions and other related TCI Program goals, such as improved air quality, public health, resilience, and more affordable access to clean transportation alternatives.” (The added words are identified in bold.)

We further suggest adding the following paragraph at the end of Section 6 on Program Monitoring and Review: “In order to facilitate these reviews, the Regional Organization will develop, with the input of the Participating Jurisdictions and experts in the field, a consistent mechanism for measuring the emissions impacts of program investments across the Participating Jurisdictions.” Without such a system, including agreed-upon measures and mechanisms for collecting and ensuring the accuracy of data, the real impacts of the TCI system will be difficult if not impossible to discern.

In conclusion, we are eager to continue to work with you as you finalize a program design. The transportation sector is arguably one of the most challenging sectors to decarbonize, and a well-designed TCI program will enable us not only to reduce emissions, but also to expand mobility options across the Commonwealth and the entire TCI region. We look forward to advancing this program and making progress on our shared goals. Should you have any questions or if we can be of assistance, please do not hesitate to contact Lizzi Weyant, Director of Government Affairs, at 617-933-0703 or [eweyant@mapc.org](mailto:eweyant@mapc.org).

Sincerely,

Marc Draisen,  
Executive Director