



October 15, 2020

Dear Members of the Transportation and Climate Initiative Leadership Team:

Thank you for the opportunity to provide feedback on the September 29th webinar regarding the participating jurisdictions' proposal to ensure equity in the Transportation and Climate Initiative program design. The Metropolitan Area Planning Council strongly believes that TCI will be an important part of a larger effort to decarbonize our transportation system and improve access to clean mobility options. We appreciate the chance to provide recommendations for strengthening the equity provisions included in the TCI program design.

The COVID-19 pandemic has made evidently clear the connection between our changing climate and public health disparities, heightening the urgency to reduce carbon emissions and improve air quality in our most underserved and overburdened communities. MAPC's own research on vehicle air pollution proximity found that 45% percent of our region's Black residents, 47% of the region's Asian residents, and 54% of the region's Latino residents live in the highest-pollution areas, compared to only 29% of the region's white residents.¹ The same communities facing a disproportionate share of tailpipe emissions are also often those with limited access to clean, reliable, and affordable transportation options. We encourage the TCI leadership team to center these historic inequities when finalizing the MOU, developing complementary policies, and devising a strategy for implementing the cap-and-invest program in each participating jurisdiction.

MAPC supports the equity provisions discussed in the webinar. **Our primary recommendation is that these parameters, when incorporated into the final MOU, are more specific, actionable, and yield measurable outcomes.** While each participating jurisdiction will need some reasonable amount of latitude to tailor the program to meet its own unique needs, leaving too much open to interpretation could undermine the years of work that have gone into integrating equity into the program design. We encourage the TCI leadership team to listen to the voices of environmental justice and community-based organizations in particular when determining how to strengthen these provisions. With that, MAPC would like to offer the following comments on each of the equity provisions discussed in the webinar.

Dedicated Investments: MAPC is pleased to see the TCI leadership team has included a minimum percentage of TCI revenue to be allocated to underserved and overburdened communities. Given the alignment with New York's *Climate Leadership and Community Protection Act*, 35% is a reasonable baseline minimum percentage. The MOU should clearly indicate that participating jurisdictions are allowed and encouraged to allocate *more* than 35% of their revenue to clean transportation investments in underserved and overburdened communities.

¹ "Racial Disparities in the Proximity to Vehicle Air Pollution in the MAPC Region," <https://www.mapc.org/pollution-disparities-covid19/>.

Additionally, we strongly encourage the TCI leadership team to include more specificity about what it means for a jurisdiction to invest TCI revenue in underserved and overburdened communities. While the definition of underserved and overburdened communities will vary across jurisdictions, the final TCI MOU should be precise about what it means for investments to *benefit* these communities. For the purposes of TCI, a benefit could look like a new or improved clean mobility option that serves residents in underserved and overburdened communities, or an investment that yields a measurable improvement in air quality in an underserved and overburdened community, or even investments that support affordable housing development close to transit. Being clear about this definition from the outset and codifying it in the MOU will better integrate equity into the program design and support the work of the Equity Advisory Boards to ensure those most burdened by our transportation system are benefiting from TCI.

Processes: Equity Advisory Boards and Community Outreach: MAPC supports the creation of the Equity Advisory Boards and believes they have the power to bring in voices from communities that will be most impacted by TCI. **The TCI leadership team should be specific about the role and responsibility of the EABs and ensure they are empowered to make decisions regarding investments in underserved and overburdened communities.** The roles listed during the webinar (identify underserved and overburdened communities; provide guidance for investments, and; define goals and metrics for measuring progress) should all be under the purview of the EABs. Because the role of the EAB is to give voice to underserved and overburdened communities, MAPC recommends that a majority of the members of the EABs are residents of these communities or representatives of environmental justice and community-based organizations that serve these communities. Meetings of the EAB should be open to the public so that residents not formally serving on the board also have an opportunity to weigh in on investment decisions and other aspects of the program.

In addition to these meetings, **the participating jurisdictions should commit to a minimum number of community meetings they will hold as part of the community outreach provision in the MOU.** Assuming EAB meetings are open to the public, holding public meetings biannually would be an appropriate baseline to include in the final MOU. When the public health guidelines deem in-person meetings safe, these meetings should be held in underserved and overburdened communities. Even then, accessible virtual participation option should be made available so that the meeting is accessible to as many residents as possible.

Transparency: MAPC strongly encourages the participating jurisdictions to adopt the provision for annual reporting described in the webinar, including “expenditures of proceeds and with respect to equity.” **The annual reports should also include data related to the goals and metrics for defining progress as determined by the EAB.** Should the goals not be achieved, the annual reports should lay out steps that will be taken the following year to get back on track.

Complementary Policies: Complementary policies will be an integral part of ensuring TCI addresses the unique transportation, climate, and equity concerns in each participating jurisdiction. **MAPC strongly encourages the TCI jurisdictions to continue to collaborate to share knowledge and best practices related to possible complementary policies.** Given the highly localized nature of complementary policies, we



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particularly look forward to partnering with our colleagues in the Baker Administration to advance complementary policies in Massachusetts that will expand affordable clean mobility options in the Commonwealth.

The equity provisions outlined by the TCI leadership team are a great step toward integrating equity into TCI. MAPC remains committed to supporting Georgetown Climate Center and the TCI leadership through program design and implementation. We are pleased to see the progress made on the program thus far, and look forward to reading the final MOU later this fall. If we can be of assistance by hosting a follow up convening of our fellow regional planning entities, sharing information about the program with local elected officials, or through other means, please don't hesitate to contact me.

Sincerely,

Rebecca Davis
Deputy Director