

CT STAKEHOLDER INPUT ON OCTOBER 1, 2019 FRAMEWORK
FOR A DRAFT REGIONAL POLICY PROPOSAL

TO:

- Governor Ned Lamont
- Commissioner Katie Dykes, Connecticut Department of Energy & Environmental Protection
- Commissioner Joseph Giulietti, Connecticut Department of Transportation
- Keri Enright-Kato, Connecticut Office of Climate Change
- Senator Christine Cohen, Co-Chair Environment Committee
- Representative Mike Demicco, Co-Chair Environment Committee
- Senator Craig Miner, Ranking Member, Environment Committee
- Representative Stephen Harding, Ranking Member, Environment Committee
- Senator Carlo Leone, Co-Chair Transportation Committee
- Representative Roland Lemar, Co-Chair Transportation Committee
- Senator Henri Martin, Ranking Member, Transportation Committee
- Representative Laura Devlin, Ranking Member, Transportation Committee
- Representative Brandon McGee, Chair, Black & Puerto Rican Caucus

Transportation Climate Initiative Regional Policy Workgroup,

Thank you for the opportunity to provide input on the "[Framework for a Draft Regional Policy Proposal](#)" released on October 1, 2019. We, the undersigned organizations, support a regional policy to reduce transportation pollution. We also believe robust and meaningful public input into both the regional and state decision-making on the Transportation and Climate Initiative (TCI) is necessary to ensure a just and equitable policy design for Connecticut.

This input on the draft policy is provided by the undersigned and informed by feedback from Connecticut stakeholders representing advocates for transportation, environmental justice, labor, consumers, health, housing, and environment.

Over the last several months Connecticut stakeholders have held two in-person meetings and one online meeting. In October 2019 CT stakeholders conducted an online survey, completed by more than 800, to solicit input on TCI. The survey results are summarized here - www.tinyurl.com/tci19results. As the TCI policy is developed, much more needs to be done to outreach to low-income communities, communities of color and rural communities to have input that is representative of our state's population.

Equity - The TCI draft regional policy proposal highlights the importance of addressing equity, environmental justice, non-discrimination, and public participation. It places equity first among the program design elements. We welcome and applaud this approach.

Our current transportation system is profoundly inequitable; investment is largely focused on serving single-occupancy vehicles and trucks, a strategy that thus far has resulted in an increase in pollution and vehicle miles traveled. Our current transportation investment strategy also results in disproportionate impacts of transportation pollution and inequitable access to transportation. Transportation pollution exacerbates asthma and other respiratory illnesses that already disproportionately impact low-income households and communities of color. Walking, biking, and mass transit options are under-resourced.

The above mentioned survey of Connecticut stakeholders shows overwhelmingly support (82%) for prioritization of equity and environmental justice when reinvesting program proceeds. 67% support a dedicated percentage of investments to address environmental justice, equity, and disproportionate vehicle pollution exposure. An additional 15% want to go even further and only consider environmental justice and equity investments of TCI funds.

As Connecticut progresses with development of our state's TCI program, we recommend the state identify communities that are 1) disproportionately impacted by transportation pollution, 2) lack reliable transportation options, and 3) depend on safe walking and biking options and transit to move from place to place. Connecticut must provide meaningful and ample opportunities for these communities to learn about and provide input into the TCI program as the program is developed and implemented including, but not limited to public forums, surveys, online materials that include recordings of meetings, and online options to provide input.

Specific steps for CT to take to ensure equity in all aspects of the TCI plan:

1. Requirement for CT to adopt complementary policies in addition to TCI implementation. The October 2019 survey of CT stakeholders ([TCI background and survey executive summary](#), and [full survey results](#)) can be used as an initial gauge of some complementary policies that have the support of those surveyed.
2. Ensure that environmental justice community members will be included in program planning process and implementation

Affected Fuels and Emissions - We support the draft regional policy proposal to cap CO₂ emissions from the combustion of motor gasoline and on-road diesel fuel in the region. These fuels are responsible for the majority of emissions from the transportation sector. We ask that the TCI states and Connecticut in its own policies continue to work towards regulating other transportation fuels including biofuels, aviation fuels, marine fuels, and methane and propane used as transportation fuels.

We urge that the regional policy set emission limits consistent with economy-wide climate goals that have been established by Connecticut and other participating states. Data provided by TCI states, showing the projected impact of TCI on emissions from covered fuels only, shows emissions reaching approximately 150 MMT CO₂ by 2032. It is estimated Connecticut's share of these 2032 emissions to be only 7 MMT CO₂. Connecticut's Global Warming Solutions Act (GWSA) mandates an economy-wide reduction in greenhouse gas emissions of 45% below

2001 levels by 2030. Applying that GWSA mandate to the transportation sector would equate to roughly 9.2 MMTCO₂ in 2030 for all transport activities, if emissions from all sectors are reduced proportionately. We support having the regional policy set an emissions limit for Connecticut at the stronger 7 MMT CO₂, but at a minimum aligned with the GWSA mandate.

Regulated Entities - We support the TCI states' proposal to enforce the CO₂ emissions cap upstream, focusing on "Prime Suppliers" of transportation fuels as defined by the US Energy Information Administration (EIA). We acknowledge that the framework includes additional entities beyond Prime Suppliers, which could include a point of regulation that differs in each TCI jurisdiction. We support selecting EIA's Prime Supplier categorization, with additional specificity, or a similar point of regulation that would provide the most efficient program implementation. We question what additional entities beyond Prime Suppliers would be regulated entities in each jurisdiction.

Investment of Proceeds - Reducing transportation pollution should be the overarching goal of TCI investments. As noted above, stakeholders in Connecticut have indicated a desire to prioritize equity and environmental justice when reinvesting program proceeds in our state. By doing so, we can simultaneously help meet our state's greenhouse gas emission reduction targets and reduce disparities in exposure to transportation pollution and access to transportation. Connecticut's Global Warming Solutions Act requires that the state reduce greenhouse gas emissions from 2001 levels 45% by 2030 and 80% by 2050. Nearly 40% of Connecticut's greenhouse gas emissions are produced by the transportation sector.

We urge Connecticut to use the following recommended guidelines to make investments that prioritize equity and environmental justice:

Invest in overburdened and underserved communities - Undertake an open and transparent process to expand low-carbon and clean mobility options in urban, suburban, and rural communities, particularly communities overburdened with transportation pollution and underserved by the current transportation system. California's CalEnviroScreen and New York's Climate Leadership and Community Protection Act (CLCPA) may provide useful examples. Place high priority and substantially commit to a dedicated, minimum percentage of investments in the identified communities. Stakeholders in the identified communities must be actively involved in the investment decision-making process. Regularly review the monitoring data from overburdened and underserved communities with community stakeholders.

Equity in access - By expanding public transit, investing in walking and biking infrastructure, and providing other resources in underserved communities, Transportation Climate Initiative investments in Connecticut should aim to increase access to housing, jobs, education and healthcare.

Invest in Quality Jobs: Investment decisions should include policies that prioritize the creation of high quality jobs, protect wages and benefits, encourage project labor agreements, protect and

strengthen worker safety and equitable hiring practices. Seasonal, temporary, and part-time work should be minimized. Quality jobs that address equity concerns provide: (1) family-sustaining wages and benefits; (2) employer neutrality in union organizing campaigns; (3) training and advancement opportunities; and (4) targeted hiring provisions that establish commitments to hiring disadvantaged workers, including low-income, people of color, women, veterans, formerly incarcerated, people with disabilities, workers from underserved communities and those displaced from fossil-fuel jobs. TCI investments should support public and private investment in pre-apprenticeship and apprenticeship programs for new clean transportation jobs by working with labor unions and state and local educational institutions.

Accountability: State level advisory councils must include the affected populations in a significant way. TCI revenues must be used for the intended purposes, and protected from budget raids. TCI investments decisions must be transparent, and publicly available for review. TCI revenue must not go into the Connecticut general fund.

When deciding where to invest proceeds, we also urge Connecticut to consider lifecycle emissions. In the [October 2019 survey](#), 75% felt life cycle emissions should be included when evaluating investments, not just on-road emissions. TCI funds must not be re-invested to expand transportation systems that run on gasoline, diesel fuel, biofuels, methane / propane, aviation fuel, or marine fuels.

When evaluating TCI revenue equity investments and measuring the effect of those investments, consider co-benefits such as air pollution level reduction, living wage jobs creation and employment levels, public safety benefits from reduced motor vehicle crashes, mobility and jobs accessibility increases, and reductions in health disparities. The co-benefits of sustainable transportation and development should not just be measured, they must be shared and celebrated as important achievements along with the reduction in greenhouse gas emissions.

In Connecticut, [October 2019 survey results](#) show support for several TCI investments. The following items are ranked by combined 'strongly support' and 'support' percentages.

- 92% - Improving existing public transportation including buses, trains, and dial-a-ride
- 91% - Expanding / improving sidewalks and bike lanes to provide safe alternatives to driving
- 88% - Expanding public transportation and rail to people and places not yet served
- 85% - Convert transit and school bus fleets to electric power
- 79% - Gap financing for transit-oriented development to decrease driving trips
- 77% - Protecting existing infrastructure from the effects of climate change and catastrophic weather
- 77% - Rebates for hybrid and electric vehicles

Complementary Policies - We encourage the Connecticut to pursue and/or continue complementary policies that aim to reduce greenhouse gas emissions and address equity

issues. Connecticut's TCI investments should not replace current complementary policies. They should also not be used to expand or build new highways.

In Connecticut, [October 2019 survey results](#) show support for a number of possible complementary policies. The following items are ranked by combined 'strongly support' and 'support' percentages.

- 87% - Stormwater contamination reduction projects evaluated for green infrastructure component
- 86% - Emissions reduction goals in municipal 10-year plans of Conservation & Development
- 85% - Bus Transit and School Bus Electrification
- 83% - All regional planning agencies (COGs) include emissions reduction targets in long-range plans
- 79% - Expanding U-Pass to private colleges, universities, and large private employers
- 78% - Policies at public agencies that require emissions reductions goals and reports on progress

Organizations Signing On to this Letter:

- Acadia Center
- Chispa CT
- Collaborative Center for Justice
- CT Clean Water Action
- CT League of Conservation Voters
- CT Roundtable for Climate and Jobs
- Hartford Advisory Commission on the Environment (ACOTE)
- Sierra Club Connecticut
- Transport Hartford Academy at the Center for Latino Progress
- Tri-State Transportation Campaign

Individuals Signing On to this Letter:

- Adam V.S. Abbate
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- Shaniya Davies
- Dennis M Desmarais
- Benjamin Hensley
- Keonte Little
- Gannon Long
- Mary McAtt
- Barry Rahmy
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- Mary Stevens

- Steve Wagar
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