

15 October 2020

**Clean Air Council Comments on TCI Ensuring Environmental Justice and Equity
To: TCI Leadership Team, Workgroups, and State Agencies**

Clean Air Council is a member-supported non-profit environmental advocacy organization whose mission is to protect everyone's right to a healthy environment. The Council is headquartered in Philadelphia and works across Pennsylvania, Delaware, and New Jersey. Nationally, transportation sources are the leading contributors of greenhouse gas emissions, and a regional program to reduce emissions from the transportation sector is an important strategy to combat the global climate crisis. The Council strongly supports a regional program that features a stringent cap on transportation emissions, measures to ensure equity throughout the region, and investments that prioritize active transportation. These comments are in response to the recent "TCI webinar on ensuring environmental justice and equity in a regional low-carbon transportation program."

Recommendation 1

Adopt a cap level with the greatest possible emissions reduction (25% or more) and invest primarily in active transportation.

According to the recent [TRECH](#) study from Harvard and other research institutions, a more stringent emissions cap designed to drive significant emissions reductions by 2032 (25% or greater), and investments focused on active transportation like biking, walking, and public transit, results in greater health benefits and stronger equity outcomes. The study shows a 4-fold difference in health benefits, including number of lives saved, across the 20-25% cap and the level of investment in active transportation. The opportunity to significantly improve health outcomes - as much as \$11 billion in monetized health benefits and 1,100 lives saved annually - is likely if states are willing to adopt a stringent emissions cap and make smart investments that prioritize people's mobility over personal vehicles.

Recommendation 2

Raise the minimum dedicated investments for underserved and overburdened (UAO) communities to more than 35% and use a proportion of population instead of a strict percentage of investments.

According to Census survey data, roughly 30% of Pennsylvania's population lives in what the Pennsylvania Department of Environmental Protection (DEP) defines as an Environmental Justice (EJ) area. If this is ultimately what the program defined as an UAO community, the 35% dedicated investment would barely go above the representative proportion of this group, and would certainly not meet the standard for equity. To achieve equity, UAO communities should receive more than their proportional share of investments, since we know they are more disproportionately burdened by air pollution.

Each state will have a different percentage of their population that falls under the definition of UAO, so a set investment percentage will not result in real equity in each state. Clean Air Council supports a minimum baseline number (such as 35% or more) of investment proceeds

going to UAO communities, but the Council believes that a proportional rate of investments would be more equitable, such as 1.5 or 2 times the percent of population that qualifies as UAO. In Pennsylvania's case, this would amount to 45-60% of investment dollars if DEP's EJ areas are used to define overburdened and underserved communities.

Recommendation 3

In determining how to allocate revenues, states should be broken down into smaller regions, each with its own advisory committee, dedicated outreach plan, and the power to guide investments. Advisory committees should be made up of a majority of residents from UAO communities.

While the Council supports each state independently defining UAO communities, as the geography, demographics, and local conditions of each state vary widely, so do regions within each state. In Pennsylvania alone, there exists a 1st class city, a 2nd class city, several 3rd class cities, and hundreds of miles of rural area, each with its own specific concerns and unique challenges. States such as Pennsylvania are too large to conduct meaningful statewide community outreach. Furthermore, states like Pennsylvania are too diverse to have a single advisory committee. It makes more sense and is more equitable to break down large states such as Pennsylvania into smaller regions, with region-specific outreach plans and local advisory boards that better represent the local regions they serve. This will better ensure that the goals of the equity components of TCI will be successful.

In addition, more specific requirements about the advisory boards should be developed including that the advisory boards be made up of a *majority* of residents living in overburdened and underserved communities, and that if states' investments differ from the guidance of these advisory boards, their decision making be made public. The advisory board organizations should receive capacity support to serve on the committee in the form of grants to attend meetings and support to develop their own project ideas and priorities. This should not come out of the 35% of TCI funds for equity; the 35% should be used by states only for emissions reductions programs.

Recommendation 4

A mechanism should be put in place to ensure the geographic spread of investments, and both investments and emissions reductions should be easily trackable by a public facing dashboard, thereby increasing transparency.

It is crucial that all UAO communities in the TCI region benefit from the program. It would not be adequate or truly equitable if only a few UAO communities in each state engaged in the program and ultimately saw benefits from the TCI program and its investments. Local advisory committees, each with responsibility to suggest how funds should be invested in their region, can help to serve as a mechanism that ensures geographic fairness and equity. The investments and benefits from the program should be presented to the public on an ongoing dashboard that is easily accessible, as well as the emissions reductions that result from the TCI program and its investments. This dashboard should identify which investments are made in UAO communities, and the percentage of overall investments.

In order to quantify emissions reductions in these communities, local air monitors should be installed throughout the states to gather baseline data and monitor progress. Emission reductions in UAO communities should be guaranteed through this program and progress should be publicly available.

Recommendation 5

Projects should have demonstrable co-benefits.

TCI project investments should have demonstrable co-benefits for the health and quality of life of UAO communities, including lowering of local emissions, more safe greenspace including increased access to biking and walking, or traffic safety projects that reduce fatalities and severe injuries. The TCI program is designed to reduce greenhouse gases from the transportation sector, which are global pollutants. To reach the states' equity goals, there must also be concrete local health benefits. According to the TRECH study, much of the opportunity for health benefits from this program will derive from complementary policies, and specifically investments in public transit, biking, and walking.