

Written Comments in Response to the Draft Memorandum of Understanding of the
Transportation and Climate Initiative

By Isles, Inc.

Submitted by:
Katharina Miguel
Clean Energy Advocate
Isles, Inc.
kmiguel@isles.org
February 28, 2020

Introduction

Isles, Inc. respectfully submits the following comments regarding the December 17, 2019 “Draft Memorandum of Understanding of the Transportation and Climate Initiative”.

Isles, Inc. is a community development and environmental organization based in Trenton, New Jersey. Our mission is to foster self-reliant families and healthy, sustainable communities. We seek low-cost, high return opportunities to generate economic growth, specifically within low-income and environmental justice communities in the state.

Because the transportation sector is the leading source of energy-related CO₂ emissions in the region, we acknowledge the need and urgency for regional collaboration. While the Transportation and Climate Initiative is an opportunity to address these issues, we urge that the program’s development and execution prioritizes low-income and environmental justice communities. We encourage a regional effort that is informed and led by locally driven initiatives, specifically from disadvantaged communities who are expected to bear the greatest impacts from the changing climate.

Recommended Provisions

There is opportunity for the Transportation and Climate Initiative to spearhead a program that reduces greenhouse gas emissions while delivering equitable solutions to frontline communities. Lessons learned from California’s cap and trade program shows that without a baseline of environmental justice provisions, local emissions reductions in these communities will not be achieved, and instead can exacerbate existing air pollution.¹ Currently, the TCI Draft MOU does an inadequate job prioritizing these communities – it includes vague language that fails to set protections, concrete goals, or specified actions. The environmental justice communities have been outspoken about their concerns of a cap and invest program, and a final MOU without intentional revisions to address these concerns will reflect the initiative’s failure to support these communities.

If the Transportation and Climate Initiative decides to move forward with a cap and invest program, we strongly urge that the MOU includes the following provisions to ensure that environmental justice and low-income communities benefit from the program:

¹ Cushing, Lara J., Madeline Wander, Rachel Morello-Frosch, Manuel Pastor, Allen Zhu, and James Sadd. “A Preliminary Environmental Equity Assessment Of California’s Cap-and-Trade Program.” USC Dornsife, September 14, 2016. <https://dornsife.usc.edu/PERE/enviro-equity-CA-cap-trade>.

1. Mandate the signatory jurisdictions to designate a percentage of the program revenue for investments towards locally driven clean energy projects within their most polluted communities. When the California cap and trade program failed to protect these populations, the state passed legislation that allocated 25% of the revenue collected from their cap and trade program towards net positive environmental investments in underserved communities. The success of the program led the state to increase the allocation to 35%.² Revenue from the Transportation and Climate Initiative should be invested similarly and can include transit, climate resilience, energy savings, and community engagement projects.
2. Include provisions for a community air protection program that will require greenhouse gas emissions and air pollutants to be monitored within identified disadvantaged communities. Make sure this data is available to the public so that communities can hold polluters accountable and work with their state on mitigation measures.
3. Establish a regional advisory committee comprised of environmental justice and low-income community stakeholders to set criteria for equitable investments, inform revenue allocations, and oversee projects.

These are just the baseline of provisions that should be added in order to develop and execute an equitable program. Additional provisions have been published by Dream Corps Green For All “Designing an Equitable Cap-and-Invest Policy for Transportation” report.

Trenton E-Mobility Pilot

At Isles, we are working with several key partners to launch an electric vehicle carshare/rideshare program in the City of Trenton to provide an affordable alternative for residents who lack reliable transportation options. The program will work to improve residents’ mobility, increase access to jobs and healthcare, and create new opportunities for low-income residents while improving air quality. The project will be informed by community stakeholders and residents and has a vigorous education plan to encourage participation. While the project is still in its development stages, it is an example of an equitable solution that should be at the forefront of investments made by signatory jurisdictions of the Transportation and Climate Initiative. After initial evaluation, Isles will report challenges and lessons learned to TCI. Please contact Katharina Miguel at kmiguel@isles.org for questions.

Conclusion

We believe that a final Memorandum of Understanding that is reflective of environmental justice and low-income community priorities will pave the pathway for reducing greenhouse gas emissions effectively and equitably. Thank you for the opportunity to provide feedback.

² Fort, Eleanor, Natalia Chung, Jaime Peters, and Michelle Romero. “Designing an Equitable Cap-and-Invest Policy for Transportation.” Dream Corps Green For All. December 2019. <https://www.thedreamcorps.org/resource/designing-an-equitable-cap-and-invest-policy-for-transportation/>