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## COMMENTS ON TCI's SEPTEMBER WEBINAR MATERIALS

Please accept the following comments from No Fracked Gas in Mass (NGFIM) & the Berkshire Environmental Action Team (BEAT). BEAT works to protect the environment for wildlife in support of the natural world that sustains us all. No Fracked Gas in Mass works to stop the expansion of fossil fuel infrastructure in the Northeast states and to promote energy efficiency and sustainable, renewable sources of energy and local, permanent jobs in a clean energy economy.

The comments below relate specifically to the information presented during the two webinars hosted by the TCI in the month of September 2020 titled "Webinar on program design, modeling, and the implications of COVID-19" and "TCI webinar on ensuring environmental justice and equity in a regional low-carbon transportation program"

### **Setting a Realistic Emission Reduction Target for 2032**

According to the materials presented in the Webinar, the TCI is considering scenarios where the 2032 targets are 20%, 22%, and 25%. Yet, according to the baseline modeling presented, there is an expectation that, under the most likely conditions, emissions will drop by 19% without the TCI. Based on the minimal impact that these caps will have, NFGIM and BEAT call on the TCI to set a target of *at least 25%* reductions and to preferably consider setting a target that is in line with emission reductions necessary to stay below 1.5°C.

### **Response to the prompted question: How should the program be designed to ensure reductions and other program benefits amid uncertainty?**

In order to ensure that the TCI can accommodate for uncertainty in the economy, the TCI proposes implementing a Cost Containment Reserve (CCR) when prices get too high and an Emissions Containment Reserve (ECR) when prices get too low. In the presentation, the TCI working group asked for additional suggestions to stabilize the program. In the event that the upper trigger price is hit, BEAT and NFGIM recommend that a mechanism be implemented that would require jurisdictions to spend a minimum percentage of the TCI's revenue on the most

efficient emission reduction efforts. In this way, the program could ensure that steps are being taken to limit the likelihood that the upper trigger price is hit in the future.


### **Set a higher minimum investment requirement in underserved and overburdened communities**

According to the materials presented in the Webinar, the TCI will establish a minimum investment requirement for all jurisdictions of 35% in underserved and overburdened communities. Given the vastly disproportionate burden that environmental pollution from transportation has on environmental justice communities, as well as the potential disproportionate impact that the increased cost of gasoline that will result from the implementing TCI, BEAT and NFGIM call on TCI to increase the minimum investment requirement to underserved and overburdened communities to 50%

### **Include Biofuels and Alternatives in the list of Affected Fuels**

BEAT and NFGIM supports the inclusion of biofuels under TCI jurisdiction. While there is evidence that biofuels reduce the amount of carbon dioxide emitted from combustion<sup>1</sup> - meaning direct emissions - when accounting for indirect emissions such as land-use change and nitrogen emissions from fertilizers, the benefits of biofuels are not clear and are variable on a case by case basis.<sup>2</sup> Therefore, biofuels must be included within the TCI jurisdiction to ensure to required increased efficiency and emission reductions within that sector. Furthermore, while it's market share is relatively small compared to conventional fuel, excluding biofuels in the TCI program will mean that their emissions are not accounted for in the emissions cap that the program set. This results in program leaks and inhibits the program's ability to comprehensively reduce emissions generated from the transportation sector.

Respectfully submitted,



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<sup>1</sup> Chen et al., *Life cycle energy and greenhouse gas emission effects of biodiesel in the United States with induced land use change impacts*, Bioresource Technology, (March 2018) <https://tinyurl.com/y4y726p8>

<sup>2</sup> Intergovernmental Panel on Climate Change, *Climate Change 2014: Mitigation of Climate Change, Chapter 8*, pg 616 <https://tinyurl.com/y3ekan78>