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RE Comments on Draft TCI Plan

Thank you for the opportunity to comment on the draft TCI.
I attended the informational session at Mt Holyoke College on Nov 4, 2019.

Who I am: I directed the Tour de Sol, America's Green Car Festival and Competition, run by the Northeast Sustainable Energy Association (NESEA) for 18-years. The original goal of the Tour de Sol was to advocate for electric vehicles (EVs) recharged by renewably-produced electricity – and to demonstrate that EVs work. At USDOE's insistance, ethanol and biodiesel-powered vehicles entered the competition for many years. We therefore added measuring GHG emissions to our scoring system. We worked with Argonne National Laboratories to achieve that goal, and EVs always come out on top! In addition to the USDOE, sponsors included auto manufacturers, electric utility companies, the US EPA and DOT, and state DEPs and DOTs. The annual event grew to 50 entrants. Electric utility companies entered the competition with OEM-built vehicles. Entrepreneurs and students from universities, colleges and high schools built EVs and demonstrated their capabilities. The event started 30-years ago in 1989.

Comments:

Overall: I am excited about the potential of the TCI.
I was thrilled to see the program goals embraced equity, environmental justice, non-discrimination and meaningful public participation as its top priorities, and that the program recognizes the inequity and vulnerability of low income and people of color RE: mobility, public health risks, historically and now to our changing climate.

The Overall Cap: Please use 1.5^{o}C global temperature rise as the goal when calculating the emissions cap.

RE Biofuels-Affected Fuels and Emissions: I would recommend that transportation fuel providers NOT be incentivized to increase the use of biofuels, unless NEW ways are developed to produce them that do not use farmland, or tropical rain forest land, to produce ethanol or biodiesel.

This does bring up the question of how transportation fuel suppliers can stay below the cap, unless they advocate for more fuel-efficient vehicles and EVs, both of which would reduce their profits. In comparison to RGGI, transportation fuel providers do not have the flexibility that electricity-generating companies to offer near-zero GHG emission electricity. Unfortunately, biofuels are not the answer.

The Cap for each Jurisdiction: I was happy to see that emissions' caps would be based on existing emissions. I would expect that the allocations, if looked at on a per-person basis would be 2-3 times higher for rural communities (which have greater need to travel to jobs, food etc., and tend to have many low-income people) than urban communities, and that small cities, such as Greenfield, where I live (pop,17000), would be someplace in between.

Investment of Proceeds: While the informational meeting asked for input into “strategies on how proceeds should be spent,” I was happy to see that each Jurisdiction makes the decisions on how the funds will be invested. If, however, you were looking for thoughts and ideas that you could use as examples, I have a few thoughts.

EV incentives. Great idea, BUT If offered evenly across the board, they are NOT equitable…they are merely incentivizing those who can afford an EV to buy one. People who live in rural areas in very small towns are often low-income people, AND they drive the most for necessities such as jobs, food, and education etc. Therefore, higher incentives for purchasing EVs, including USED EVs, and EV infrastructure should be offered to folks who live in rural communities. Perhaps there is a way to offer even higher incentives to low-income residents.

Jurisdictions should be encouraged to look at a suite of investments. For example, California invested in public transit and housing at transportation nodes, so as to reduce transportation fuel use by making it easy for people to use public transit instead of a car. Bringing this idea to Greenfield, I would hope that our community would opt for supporting our public transit system AND invest in downtown buildings to make our downtown more vibrant, AND in homes within 1 to 2-mile walking distance from our downtown. These investments would motivate people to live near downtown, and keep their cars, if they have one, parked at home. This strategy will revitalize our historic downtown, which will draw additional private investment.

The book, *Strong Towns*, offers an interesting analysis urban “productivity per acre.” Contrary to common belief, a downtown acre, or acre of low-income housing, generates more tax revenue/Acre (and jobs) than a suburban neighborhood or a big box store.

Small rural communities have completely different needs.

Thank you for listening!