

I write in support of the Transportation and Climate Initiative (TCI). This regional collaborative will not only reduce greenhouse gas emissions in participating states, but – with the right investments – will also reduce air pollution burdens and lack of transit access in communities across the Northeast. As noted, transportation is now the primary source of carbon emissions in the region, but transportation is also a necessary part of how our society functions. How to get from place to place is a decision every resident of the region is making each day, and investments from TCI can shift these decisions to be ever more sustainable and just. This collaborative between states presents an incredible opportunity to build a regional transportation system that works for everyone living here while also reducing emissions, with an ultimate aim of fostering resilient and cohesive communities.

Below are comments for consideration as you revise the draft Memorandum of Understanding (MOU). I urge the collaborative to consider these with final revisions and as investment scenarios develop.

Set a Strong 25% Reductions Cap and Increase Allowance Prices

I support TCI states in committing to the strongest emissions cap of 25% reductions. Based on the currently available modeling outputs and those being generated through the TRECH Study, this cap will result in the most co-benefits in participating communities while responding to our current climate crisis with necessary urgency. Regional communities would also benefit from increased support for local transit and EV infrastructure from the \$500mil revenue expected from this cap.¹ In TCI's Declaration of Intent, the 12 commissioners and state agency heads recognized "the need for significant reduction in greenhouse gas emissions by mid-century in order to prevent major impacts of climate change globally," and I press them to have this statement at the core of their decision determining the ultimate cap.²

Following, all allowances should be sold to emitting organizations from the start of the program. If the cap is set to 25% but emission sources continue emitting due to free transition allowances, the cap will be doing nothing to curb emissions and communities will continue to suffer from poor air quality. Additionally, pricing mechanisms should be in place to ensure that there is a minimum cost for purchasing these allowances from the start of the program, with prices gradually rising throughout its development as transitioning becomes easier and easier for emitting parties. This will not only ensure that participating municipalities and communities continue to benefit from the program's funding, it also ensures that emissions continue to steadily decline. TCI should be designed to hold emitting parties accountable for their environmental, social, and health impacts. It is imperative that collaborating states ensure that the flexibilities included in the design allow for a smooth transition without negating the program's central aim.

Limit Total Offsets and Prevent Any Outside the TCI Region

Transportation emissions impact everyone, and they are not confined by state borders.³ TCI has strength in being a regional collaboration, reducing emissions both in individual states and in the region overall. I urge the collaborative to strengthen this even further by specifying a very limited number of offsets that

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<https://www.transportationandclimate.org/main-menu/tcis-regional-policy-design-process-2019#Latest%20Updates>

² The Transportation and Climate Initiative, An Agenda for Progress. Declaration of Intent.

<https://www.transportationandclimate.org/sites/default/files/TCI-declaration.pdf>

³Parrish, D. D., et al. (2009). Overview of the Second Texas Air Quality Study (TexAQS II) and the Gulf of Mexico Atmospheric Composition and Climate Study (GoMACCS), J. Geophys. Res., 114. doi:10.1029/2009JD011842.

can be used for compliance alternatives. Purchasing offsets from outside the TCI region should be fully restricted, as this would fail to reduce point source emissions in communities participating. Additionally, offsets within the region should only be used under strict conditions, after rigorous assessment of the potential for inequitable distribution of related emissions and pollution.⁴

Foster Community Involvement in TCI Decisions from the Start

It is critical that TCI continue to engage with communities across the region as the program develops. Without this involvement, cap and invest programs can lead to inequitable distribution of emission burdens, further widening existing disparities in health and wellbeing between neighborhoods.⁵ This collaborative is strengthened by its regional reach – as partnering across states and agencies allows for greater efficiency – but this also presents a challenge in ensuring all impacted communities are included in decision making processes. Therefore, specific language should be included in the MOU that defines how community engagement will be incorporated across states and how often equity analyses will be completed to ensure that no community goes overlooked as the program progresses.

At the center of the draft MOU, TCI states are calling for not only a more sustainable transportation system with fewer carbon emissions, but also a transportation system that seeks to promote environmental and social justice for all communities. Within the current MOU, the signees have agreed to “work with communities to ensure that the benefits of a cap-and-invest program flow equitably to communities that are underserved by clean transportation alternatives, disproportionately bear the costs of the current transportation system, or suffer disproportionate impacts of vehicular pollution and climate change.”⁶ It is critical that TCI states define their ultimate program around this commitment.

Statement of Relevant Expertise

I am a MPA candidate at The Cornell Institute for Public Affairs concentrating on environmental policy. I am a member of the sustainable global enterprise and the environmental finance and impact investing cohort. I am a returned Peace Corps volunteer and former teacher.

Thank you for the opportunity to comment.

Respectfully,

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⁴ Anderson, C., Kissel, K.A., Field, C.B., and Mach, K.J. (2018). Climate Change Mitigation, Air Pollution, and Environmental Justice in California. *Environmental Science & Technology*. 52 (18), 10829-10838. DOI: 10.1021/acs.est.8b00908

⁵ Cushing L, Blaustein-Rejto D, Wander M, Pastor M, Sadd J, Zhu A, et al. (2018) Carbon trading, co-pollutants, and environmental equity: Evidence from California’s cap-and-trade program (2011–2015). *PLoS Med* 15(7): e1002604. <https://doi.org/10.1371/journal.pmed.1002604>

⁶ Draft TCI MOU, page 3.