



Comments on TCI's Framework for a Draft Regional Policy Proposal — 11.5.19

While the science was already compelling enough (IPCC's call for a 45% reduction in greenhouse gas emissions by 2030), 11,258 scientists from 153 countries just issued a report this morning (<https://www.washingtonpost.com/science/2019/11/05/more-than-scientists-around-world-declare-climate-emergency>) where they "declare clearly and unequivocally that planet Earth is facing a climate emergency" and call for "massive energy efficiency and conservation practices", "quickly cutting emissions of short-lived climate pollutants, such as soot and methane, which could slow short-term warming", and "a carbon free economy" (<https://doi.org/10.1093/biosci/biz088>).

Clean Water Action shares the scientists' general sense of urgency and concern that our governments are not doing enough fast enough to address the climate impacts from greenhouse gas emissions. Clean Water Action also shares the specific concerns of the New Jersey Environmental Justice Alliance (NJEJA) with TCI as reflected in its comments submitted today including but not limited to the lack of a guarantee that emissions reductions at any particular location within the geographic scope of the program will necessarily result in emissions reductions in EJ communities.

To ensure TCI alleviates and does not exacerbate these problems, Clean Water Action strongly recommends TCI guarantees:

- 1) Mandatory emission reductions in short and long lived climate pollutants and co-pollutants across all TCI participating states, especially in overly burdened EJ communities;
- 2) Real community and EJ voices at the decision-making table throughout the process; and
- 3) Policy development precedes, does not follow, funding with all proceeds dedicated to the reduction of greenhouse gas and co-pollutant emissions in all participating TCI jurisdictions.