Comments of Deborah Cohn re the Transportation and Climate Initiative February 28, 2020

According to the EPA statistics on global greenhouse gas emissions (GhG) by economic sector, worldwide the transportation sector contributes 14% GhG According to the draft of EPA’s 2020 Inventory of U.S. Greenhouse Gas Emissions and Sinks (Inventory), taking into account both direct and indirect fossil fuel combustion the transportation sector emitted significantly more MMTs (million metric tons) of C02 in 2018, than the commercial, residential and industrial sectors. EPA’s inventory shows CO2 emissions of 1,803 MMT CO2 equivalent in 2018 compared with the next highest sector, the industrial sector, which contributed 1,334 MMT CO2 equivalent. Indeed, according to the EPA, the transportation activities accounted for 35.8 percent of U.S. CO2 emissions from fossil fuel combustion in 2018 compared with 27% from the industrial end-use sector. <https://www.epa.gov/ghgemissions/global-greenhouse-gas-emissions-data> See Figure ES-7 and Table ES-3.

Figure ES-6 from EPA’s 2020 draft Inventory indicates that 2018 CO2 emissions from fossil fuelcombustion (1,798 MMT CO2 equivalent) exceeded the contribution of the electric power generation sector (1,753 MMT equivalent). The contributions of those two sectors dwarfed the contributions of the commercial, residential and industrial sectors. Indeed, in Maryland transportation is the largest source of GhG emissions.

Given the significant contribution of the electric power sector to GhG emissions, nine Mid-Atlantic and Northeast jurisdictions now participate in the Regional Greenhouse Gas Initiative (RGGI) to harness the power of market forces to reduce GhG emissions. The RGGI cap and trade system sets an annual cap for the region’s aggregate CO2 emissions from the electric power sector. The cap declines 2.5% per year from 2015 – 2020. Pollution permits (allowances) are regularly auctioned to covered entities (power plants) and auction participants can trade or purchase allowances in a secondary market. This cap and trade system allows market forces to inform private sector decisions regarding supply and demand. The auction proceeds are allocated among the states, enabling them to fund programs to promote growth of renewable energy sources, reduce demand for electric power or reduce reliance on power sources that emit relatively high amount of GhG.

The RGGI system has been highly effective in reducing CO2 emissions (35%) and reducing the impact of increased electricity prices (through investing state RGGI proceeds in energy efficiency or electricity bill assistance), while the region’s economy has grown and across the region, electricity prices have decreased on average by 2%.

Now 13 jurisdictions are considering building on the RGGI model to create a similar market-driven cap and auction system for the transportation system. The proposal calls for states to reduce emissions by 20-25% by 2032. This will not be sufficient, however, to meet the CO2 emissions reductions targets of 45% by 2030 called for by the Report of the Secretary-General on the 2019 Climate Action Summit. The proposal should instead call for emissions caps that will move the Mid-Atlantic and Northeast states to a 45% reduction in CO2 emissions by 2030 so that the region can become carbon negative by 2045, allowing the world to reach carbon neutrality by 2050.

I am a person of faith. My religious leader reminded us of the binding of Isaac, the portion of Genesis that presents Abraham ready to sacrifice his son, Isaac, to prove his faith. We adults are the modern-day Abraham. By failing to adjust our behavior and our economy to address the science behind climate change, we are holding a knife to the necks of our children and grandchildren. As the story in Genesis rejected child sacrifice, we must reject child sacrifice. We must act to protect our children and grandchildren from the worst impacts of GhG emissions and climate change. I urge the jurisdictions considering a RGGI type cap and auction system for fossil fuels used in the transportation sector to create that system but target a 45% reduction in CO2 emissions by 2030.