

November 5, 2019

Transportation and Climate Initiative Jurisdictions (Connecticut, Delaware, District of Columbia, Maine, Maryland, Massachusetts, New Hampshire, New Jersey, New York, Pennsylvania, Rhode Island, Vermont, and Virginia)

Submitted via the web:

Subject: Support for Health and Equity within the Transportation and Climate Initiative Framework

On behalf of the American Lung Association, I am writing to express our support for moving forward with a thoughtful program design that affords the greatest benefits to local community health. The Transportation and Climate Initiative (TCI) is an important regional effort to maintain progress in the fight for healthy air and a healthy climate, and one that must place community health and climate protection at the forefront.

The American Lung Association's annual *State of the Air*¹ reports document the significant air quality challenges facing residents in the TCI region. For example, in the 2019 report, every county in Connecticut earned a failing grade for ozone pollution, placing the health of over 400,000 children and adults living with asthma at greater risk for health emergencies. The New York metropolitan area ranked as the 10th most polluted city in the United States for ozone pollution, followed by Washington DC (16th), Philadelphia (21st) and Hartford (23rd) also among the [Top 25 most polluted cities in State of the Air 2019](#).² The pollution burdens facing residents in the region are well known, and are especially challenging for the more than 6 million residents – including over 1.5 million children – living with asthma in the TCI region. Our climate health emergency continues to make the work of protecting our air and our health that much more difficult and demands the strongest possible policy response from our government at all levels. Increasingly, cities and states must lead the way.

The transportation sector is the leading source of climate pollution and a major contributor to local cardiovascular and respiratory health burdens, particularly for residents of communities heavily impacted by major roadways, warehouses, ports, airports, railyards and other major pollution hotspots. The [US Call to Action for Climate Health and Equity](#) endorsed by the American Lung Association and over 100 health and medical organizations called for the rapid transition away from fossil-fueled transportation toward healthier alternatives, with a priority on benefits to disadvantaged communities.³ We support the TCI cap-and-invest strategy to reduce the harmful burdens of transportation pollution and believe that the program design should maintain a focus on priority investments in communities most impacted by unhealthy air and health disparities.

¹ American Lung Association. *State of the Air 2019*. www.stateoftheair.org

² American Lung Association. *State of the Air 2019*. Most Polluted Cities. <https://www.lung.org/our-initiatives/healthy-air/sota/city-rankings/most-polluted-cities.html>

³ Various Health Organizations. *Call to Action on Climate Health and Equity*. June 2019. "Ensure that climate policies support sustainable energy for all by promoting distributed renewable energy and zero emission transportation technologies, with a priority on disadvantaged communities...Support a rapid reduction of petroleum and natural gas use in transportation through steady investment and regulations to increase fuel efficiency and transition to zero emission vehicle technologies as quickly as possible across the transportation sector." https://climatehealthaction.org/media/cta_docs/US_Call_to_Action.pdf

We support a strong TCI framework that scales up zero-emission transportation options; achieves reductions in diesel pollution and other transportation-driven health harms to local communities and focuses on reducing automobile dependency in favor of healthier transportation alternatives. By holding fuel providers accountable for reporting and reductions, the program can efficiently work to reduce harmful pollution and increase cleaner technology options to protect public health.

Ensure cap stringency and pricing to achieve and exceed state climate goals. We believe that the regional program should reflect the urgency of the climate crisis and ensure that the declining cap on transportation carbon pollution is calibrated to achieve TCI jurisdictions' climate goals and standards and demand additional, ongoing actions throughout the life of the program. The emissions cap must be set to a minimum level that drives real changes in transportation emissions - beyond current programs - sufficient to achieve goals. We encourage the program to include a minimum price to ensure a consistent signal is sent throughout the market, and encourage flexibility to adjust that signal over time to achieve necessary emission reductions and keep pace with the latest science.

Invest in improving health through community-directed projects and investment in highly impacted communities. A specific, minimum percentage of investment dollars should be assigned to ensure directed investment to communities most impacted by local pollution sources,⁴ and community input into priority projects should be a high priority. Investments will support a wide range of technologies and programs to reduce harmful pollutants, and communities most impacted by the burdens of transportation pollution must be prioritized for investment. Local knowledge of key pollution sources, threats to public health, and solutions should help guide the decision-making process in terms of the projects selected for investment. Robust community outreach and public process opportunities must be prioritized to ensure the best direction of funds to the areas of greatest need and opportunities to curb harmful pollution.

Prioritize investments with the greatest potential for public health co-benefits and elimination of health disparities. The opportunity to provide multiple co-benefits through the design of the program is critical. Program design should ensure priority is given to programs, projects and investments that provide the greatest local health benefits, with priority for investments into communities most historically impacted by transportation and other local pollution sources. With community input, the states and D.C. should pay significant attention to reducing the local impacts of diesel-powered transportation and we strongly support ongoing state investment in deployment of zero emission technologies to reduce the impacts of heavy duty transportation (e.g. investments in zero emission transit, school buses, port equipment, airport equipment, and delivery trucks⁵).

⁴ California Climate Investments Program. Priority Communities web page, accessed November 2019: "Investment in disadvantaged communities has been a requirement since California Climate Investments began in 2012. In 2016, Assembly Bill 1550 set specific funding targets for low-income communities and households in addition to the funding targets for disadvantaged communities. State agencies that administer California Climate Investments are currently implementing projects consistent with these requirements."

<http://www.caclimateinvestments.ca.gov/priority-populations>

⁵ New Jersey Department of Environmental Protection. Volkswagen Mitigation Fund Project Lists, June 2019.

<https://www.state.nj.us/dep/vw/project.html>



Enact policies to complement the public health and air quality benefits of the TCI framework. We encourage all TCI states and D.C. to enact additional policies and investment decisions to drive further changes in parallel with the regional cap-and-invest framework. TCI jurisdictions have the ability to set a clear path for sustainable transportation solutions (e.g. public fleet purchasing decisions, consumer rebates, ultra-low carbon fuel and infrastructure, and land use planning decisions that align transportation investments with the achievement of pollution reduction goals) and must pursue all feasible opportunities to act. Building healthy communities for all residents must be central to TCI jurisdictions' actions.

The American Lung Association looks forward to working with TCI jurisdictions and stakeholders to enact the strongest, most health-protective actions to rapidly decarbonize the transportation sector in ways that reduce local pollution burdens throughout our region.

Sincerely,



Lance Boucher
Senior Division Director, State Public Policy
American Lung Association

